

## Communication from Public

**Name:** Pamela Smyth

**Date Submitted:** 12/05/2023 11:19 AM

**Council File No:** 22-0392

**Comments for Public Posting:** Again and again I come to plead with you not to approve these digital billboards! If each of you lived closer than 300' to a towering 62' V shaped sign with glaring white LED lights in a 6' frame and city logo below on the box-post that sent an enormous floodlight into your home, even with draperies and shutters closed, and struck you in the face at your front door and all across your own property, you would better understand why these are not wanted by so many people. The immediate environment is impacted and yes, the light travels outward and upward, despite what you are told by the sign designers and software designers. This is not about "public service" or doing something good for Los Angeles: it's all about profit for the outdoor advertising lobby. From a distance, they look potentially harmless. Up close, they are horrendous and distracting to drivers on crowded overpass bridges and near merging traffic lanes. Last week, someone with the next city that recently adopted EMCs cut down about 12 mature and beautiful Italian Cypress trees standing 50' high to open up a 20' wide box to allow for the frame and logo to be seen by someone driving down the freeway frontage road or from atop the overpass bridge nearly 1,000 ft. east. These 48 year-old trees are the ONLY asset on this now ugly street and formed the needed wind break, light break, sound break, and air filtering break standing just 25' from the trucking lanes and I-10 freeway. Who does this? Outdoor billboard advertising does this. Look again at the proliferation you are allowing. If looking like industrial China is what you aspire for Los Angeles, then you are well on your way to bringing forth that vision to destroy a once beautiful city skyline. The attached photos show that the left side angle of the V hits my west-facing home more than it hits the freeway. You will also see the beautiful view of the open hills that my picture windows were created to take in and now what obliterates that feature. You will also see the trees now left deformed and unsightly. You will also see the view of the hills in my living room window by day and now filled with the billboard face and lights both day and night. You will also see what hits into the interior of my living room and lights up the wall so that I cannot sit near my floor furnace to keep warm without being blinded. The front door window is a vintage paned glass from the first Redlands community hospital and allows the beautiful view and

natural light to come into the entry hall and living room of this renovated 1926 farmhouse. Because I only share the city of jurisdiction boundary lines on three sides but reside in the City of Redlands, my home was not included in the initial and tiny impact study. To do this to anyone's home, driveway, and property is a taking of California real property rights to benefit a city's economic gain. The glare from the sign is so bad on my 300' driveway up slope to our rural-residential property that I now must wear very dark sunglasses to go outside or to even walk down to the street to get my mail at dusk in front of the billboard , where the rural mailboxes are located. Walking into a train headlight that can be seen for 7 miles is what living next to this monstrosity feels like. Not one of you on the planning commission or council would accept such an invasion and intrusion into your immediate living environment. Please stop the proliferation across your city, please!

Photos to show impact on residential property of EMC billboard:

The first photo shows what comes now into my living room window. The stained glass pieces once helped to hide the original static billboard and floodlights under it from my view. During the day, I see the view of the canyon and mountains across the way from the I-10 between Redlands and Yucaipa looking northwest. At night, the view is replaced by the billboard and its glaring white LED frame and city logo lights.



The sign company representatives and owners have not come to my home to see the impact yet as I now must reach out to them and ask them to honor their words, "We want to be good neighbors." This is what glares now into my home and windows from the commercial zone that abuts my Redlands rural-residential property. Here was the view before this was built as a conversion of the old static billboard that was further to the west by about 30'. This is what we saw prior to the construction of the original billboard sometime in the 1980s or early 1990s and why the picture windows across the front of our home were designed and created, where there were none that captured this peaceful view on the north side of the I-10 freeway before it was built. And then came the EMC to destroy this vista. This is what I now term, "an apartment building on a post."



Below, we see that all of this appears to be facing the freeway, but at least 75% of the viewing side is directed into my home and property. At approximately now 62' this "monument sign" hits my windows both downstairs and upstairs and blinds me from where I stood upslope in my

driveway to take this photo. This shows the magnitude and impact on one's residence in such close proximity. More than half of the viewing angle takes in my home, but the company would not change the angle to turn the sign more to the north and away from the residential properties up in the rear (three of us).

You can see in the photo to the right this frontage road that was the original cut-off to Yucaipa from Old Hwy. 99. This is the approach to my driveway that runs just in front of the white brick building. You can see the trucks coming up the grade and headlights over the cement wall embankment alongside the truck-climbing lanes. The majestic Cypress trees you see here were cut down—at least 8 or more of them—to improve billboard visibility from some vantage point perhaps ½ a mile away to the east. A duplicate sign like this is only 1,000 ft. to the east. This beautiful scene of the night-time sky no longer exists in balance and beauty. At least half of the trees are now a black hedge and eyesore.



Note: Half or more of these Italian Cypress trees planted on the abutting property, now a used car lot that originally was a lovely four-bedroom home but later converted to a business, were cut down last week to about a 10' hedge to open a rectangle to allow viewing of the lower portion of the sign. This is a travesty against nature and a huge loss to the environment in a state that cries for planting trees to help reduce freeway emissions and a city that boasts itself as a California "tree city"—and then does this. I often take photos from the lower side of my easement driveway because I am a member of the local amateur astronomy club and can get beautiful views of the moon from this vantage point now mired by the cutting down of half of this elegant stand of trees, the very kind of trees this billboard sign maker told council his company has offered to plant to help hide the billboard from my property—never came to be and most likely never will.



Now comes the view from my immediate front yard, the brick path leading to the front door, and what lights up my living room, dining room, and kitchen at night. With only an old digital camera that cannot bring the distance up to the reality of what it actually is, capturing the magnitude is very hard to do. This shows you, though, the intrusive nature of this billboard. I used to be able to look at the sunset, the moon, and the night sky until this...from 300' southwest and up-slope from the street because of the viewing angle and diagonal line that hits dead center into my front door. Because of this and a city that could care less about those who share its boundary lines and refused to, along with the sign company, adjust the angle of the V:



We now get this light trespass that glares into my front door and living room window. No one should be forced to live with this nuisance condition so that billboard companies and cities can benefit at the loss of its own homeowners.



For these reasons, I implore you all to consider what can happen to your city's residents as a result of faulty decision making and "unanticipated consequences."

## Communication from Public

**Name:**

**Date Submitted:** 12/05/2023 04:11 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I live in the City of Los Angeles and oppose the TCN program for the many reasons enumerated in the Coalition for a Beautiful Los Angeles August 22 and September 5, 2023 comment letters and those further expressed in the September 12, 2023 Daily News article describing public safety hazards associated with distracting digital billboards. These horrible bright flashing signs will cause blight and light pollution. They will distract drivers and cause accidents. They will harm residents who need darkness at night time to relax, rest and sleep. They will harm wildlife which rely on the cover of darkness to hunt at night (owls, raccoons, opossums, coyotes) or to sleep (birds, rabbits, squirrels). They will interfere with migratory birds who travel long distances to stop and visit our wetlands and natural wildlife areas. Please do not allow these horrible signs to be installed and ruin our beautiful city.

## Communication from Public

**Name:** Marcia Hanscom

**Date Submitted:** 12/05/2023 02:01 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I'm writing now to plead with you to remove the two digital billboards slated to go up at the east end of the Ballona Wetlands Ecological Reserve. The lights from these digital displays are harmful to nocturnal species - like the Owls which sleep in the day in tall trees in the Del Rey neighborhood and which then traverse right by the location for these digital signs as they enter the Ballona reserve to hunt for their food. There are numerous studies showing that such lighting is harmful to wildlife. Here are references to just a few. <https://urbanwildlands.org/abstracts.html>  
[https://www.researchgate.net/publication/221959079\\_Ecological\\_Light\\_Pollution](https://www.researchgate.net/publication/221959079_Ecological_Light_Pollution)  
Please remove these signs from the approval by the PLUM Committee TODAY and at full City Council tomorrow. THANK YOU. ~ Marcia Hanscom  
Marcia Hanscom  
Defend Ballona Wetlands! a community coalition & Ballona Institute  
The Voice for Nature on the Los Angeles Coast  
322 Culver Blvd., #317 Playa del Rey, CA 90293  
(310) 877-2634 - mobile

## Communication from Public

**Name:** Coalition for a Beautiful Los Angeles  
**Date Submitted:** 12/05/2023 02:05 PM  
**Council File No:** 22-0392  
**Comments for Public Posting:** Coalition for a Beautiful Los Angeles adds its voice in strong opposition to the Metro TCN Program. Please add our letter to the record. Thank you.

# Coalition for a Beautiful Los Angeles

*Defend our Public Spaces • Protect Our Visual Environment*

December 4, 2023

Councilmember Marqueece Harris-Dawson, Chair  
LA City Council Planning and Land Use Committee  
Los Angeles City Hall  
200 North Spring Street  
Los Angeles, CA 90012

Via Email: [Councilmember.Harris-Dawson@lacity.org](mailto:Councilmember.Harris-Dawson@lacity.org), [Councilmember.Lee@lacity.org](mailto:Councilmember.Lee@lacity.org),  
[Councilmember.Hutt@lacity.org](mailto:Councilmember.Hutt@lacity.org), [Councilmember.Yaroslavsky@lacity.org](mailto:Councilmember.Yaroslavsky@lacity.org),  
[Councilmember.Padilla@lacity.org](mailto:Councilmember.Padilla@lacity.org), [clerk.plumcommittee@lacity.org](mailto:clerk.plumcommittee@lacity.org)

Re: Item 22, PLUM Meeting of December 5, 2023<sup>1</sup> - Opposition to Metro TCN and Request for Amendments CPC-2022-5401-CA, CPC-2023-3653-ZC, ENV-2022-5286-EIR, Council File No. 22-0392

Dear Councilmember and Chair Harris-Dawson and Honorable PLUM Committee Members:

The Coalition for a Beautiful Los Angeles (Coalition)<sup>2</sup> joins with 27 Neighborhood and Community Councils,<sup>3</sup> 20 environmental and civic organizations,<sup>4</sup> and countless

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<sup>1</sup> <https://lacity.primegov.com/Portal/Meeting?meetingTemplateId=122224>

<sup>2</sup> The Coalition for a Beautiful Los Angeles (formerly Coalition to Ban Billboard Blight), established in 1986, is a non-profit dedicated to preserving, protecting and enhancing the scenic beauty and visual character of Los Angeles through education, outreach, and advocacy.

<sup>3</sup> To date, opposition has been expressed by the following Neighborhood and Community Councils: 1. Atwater Village Neighborhood Council, 2. Bel Air-Beverly Crest Neighborhood Council, 3. Brentwood Community Council, 4. Chatsworth Neighborhood Council, 5. Coastal San Pedro Neighborhood Council, 6. East Hollywood Neighborhood Council, 7. Elysian Valley Riverside Neighborhood Council, 8. Greater Wilshire Neighborhood Council, 9. Historic Highland Park Neighborhood Council, 10. Mar Vista Community Council, 11. Neighborhood Council of Westchester/Playa, 12. Pacific Palisades Community Council, 13. Palms Neighborhood Council, 14. Sherman Oaks Neighborhood Council, 15. Studio City Neighborhood Council, 16. Sunland-Tujunga Neighborhood Council, 17. Valley Village Neighborhood Council, 18. Van Nuys Neighborhood Council, 19. Venice Neighborhood Council, 20. West Adams Neighborhood Council, 21. West Los Angeles Neighborhood Council, 22. West Los Angeles Sawtelle Neighborhood Council, 23. Westside Neighborhood Council, 24. Westwood Community Council, 25. Westwood Neighborhood Council, 26. Winnetka Neighborhood Council, 27. Woodland Hills – Warner Center Neighborhood Council.

<sup>4</sup> To date, opposition has been expressed by the following community and environmental organizations: 1. Bel Air Skycrest Property Owners' Association, 2. Brentwood Homeowners Association, 3. Brentwood Residents Coalition, 4. Canyon Back Alliance, 5. Citizens for a Better Los Angeles, 6. Coalition for a Beautiful Los Angeles, 7. Del Rey Residents Association, 8. Endangered Habitats League, 9. Glassell Park Improvement Association, 10. Hillside Federation, 11. Los Angeles Audubon Society, 12. Los Feliz Improvement Association, 13. North Valley Coalition of Concerned Citizens, Inc., 14. SAG/AFTRA (Screen Actors Guild/American Federation of Television and Radio Artists), 15. Scenic America, 16.

Angelenos in opposition to the proposed Metro Transportation Communication Network (TCN) Program (Program) and writes to the City Council Planning and Land Use Management Committee (PLUM) to express our strong opposition to the Program for the reasons enumerated herein.

The City's actions in pursuing this Program do not serve its citizens well. Council entered into an agreement ("MOA") with Metro, to pursue the Program, which resulted in improper pre-commitment to the Program without appropriate environmental and administrative review, and which subjected the City to a penalty should the Program not go forward. Given the overwhelming opposition to this Program, it appears one of the reasons the City is moving forward with the Program is because of the City's improper pre-commitment to the Program.

The City, in this improper MOA, identified Metro as the Lead Agency, despite the fact that land use control rests with the City. The City failed to participate in any meaningful way in the environmental review of the Program, and now the City is rushing to modify and adopt the Program without proper administrative or citizen review of the hastily crafted changes to the Program. As a result, the proposed Ordinances contain internal inconsistencies. For example, the Ordinance addressing Los Angeles Municipal Code ("LAMC") Section 13.11.1 contains differing number of signs on pages 10-14 and in Tables 7-1 and 7-2. In addition, the Ordinances would still allow for use of sites: identified for future housing; containing parks, open space, or other sensitive resources; or which are located on the High Injury Network, as shown in **Attachment A**. Based on a review of the documents posted to the City's website on December 1, 2023, it does not appear that the City is even clear on the number of billboards its ordinances would allow, and yet the City has opted to give its citizenry only two full days to review these documents and bring errors to the City's attention. In addition, as part of this improper rush to ram through this Program, we have now been told that this item is going to Council only one day after the PLUM hearing. This is unacceptable.

The placement of offsite commercial advertising on Metro-owned and controlled property in partnership with the City subjects users of public spaces to unwanted sales pitches for goods and services and is antithetical to the idea that citizens should have public spaces/visual environment free of crass commercialization. The presence of this type of off-site digital advertising along 9 freeways and 11 city streets treats the public as consumer first and citizen second, and makes the city a marketing partner and tacit endorser of the goods and services advertised. Metro and any Public Facilities surplus land should be used for the public benefit: used in a way that welcomes visitors and residents alike, and that endeavors to make the travel experience as pleasant as

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Sherman Oaks Homeowners Association, 17. Sierra Club California, 18. Villa Marina Council, 19. Westside Regional Alliance of Councils, 20. Westwood South of Santa Monica Blvd. HOA

possible, but such a vast amount of commercial advertising can only send an insistent message of "Buy, buy, buy."

In the absence of further modification of the Program to remove signs proposed in proximity to the High Injury Network, parks and open space areas, sites identified for housing, and on public facilities land, Council must reject this Program. As noted in the letter dated November 7, 2023 from our attorney, Channel Law Group,<sup>5</sup> the Ordinances are drafted in a manner that violates State law, the FEIR for the Program is inadequate, and the City should not proceed without first preparing a Subsequent EIR, and having internally consistent ordinances which correctly avoid identified impacts and are consistent with State law.

## 1. THE REVISED PROJECT

As noted in the report from the City Attorney:<sup>6</sup> the TCN Program would be implemented by the City through three ordinances:

- An ordinance amending Article 3 of Chapter 1 of the Los Angeles Municipal Code ("LAMC") to add a new Section 13.11.1 to enable the establishment of the Transportation Communication Network on property owned by the Los Angeles County Metropolitan Transportation Authority to permit signs with digital displays;<sup>7</sup>
- An ordinance amending Article 8 of Chapter 1A of the Los Angeles Municipal Code to add a new Section 8.2.3.1 to enable the establishment of the Transportation Communication Network on property owned by the Los Angeles County Metropolitan Transportation Authority to permit signs with digital displays;<sup>8</sup> and,
- An ordinance establishing a Transportation Communication Network District pursuant to Los Angeles Municipal Code Section 13.11.1 on properties throughout the City of Los Angeles owned by the Los Angeles County Metropolitan Transportation Authority to permit signs with digital displays.<sup>9</sup>

According to the City Attorney:

In total, these draft ordinances would create a new Sign District for the TCN Project, which consists of 43 off-site digital sign structures containing a total of 75 digital displays to not exceed a maximum of

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<sup>5</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_11-07-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_11-07-23.pdf)

<sup>6</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_rpt\\_atty\\_12-01-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_rpt_atty_12-01-23.pdf)

<sup>7</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_12-01-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_12-01-23.pdf)

<sup>8</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_1\\_12-01-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_1_12-01-23.pdf)

<sup>9</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_2\\_12-01-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_2_12-01-23.pdf)

45,500 square feet of total sign area on properties owned by Metro throughout the City. The Sign District would authorize new digital signage for the project and require the removal of existing, static signage.

The letter from the City Attorney fails to include a listing of the “43 off-site digital sign structures containing a total of 75 digital displays to not exceed a maximum of 45,500 square feet of total sign area” or to document that the digital displays that would be allowed by the revised Ordinances do “not exceed a maximum of 45,500 square feet of total sign area.” That information is buried in the text of the Ordinance for LAMC Section 13.11.1. In addition, that Ordinance appears to contain conflicting number of signs and fails to identify signs that are proximate to resources of concern. The public, and our organization, has therefore been left to try to construct a list of the signs and their characteristics. This is inappropriate and deprives the public of a meaningful opportunity to comment and participate in the Program/Project review process.

Key issues with the Program are summarized herein and in **Attachments B and C** to this letter. **Attachment B** contains three of our organization’s action alerts. **Attachment C** is an editorial regarding the proposed Program and the associated politics.



PhotoSim of FF-24 Showing Massive Digital Billboard. Source: [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_3100\\_10-30-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_3100_10-30-23.pdf)

## 2. IMPROPER PROCESS

As noted in the report from the City Attorney:<sup>10</sup>

The City Planning Commission (CPC) considered the proposed ordinances transmitted by the Planning Department on September 14, 2023. The CPC recommended approval of the ordinances with modifications. On November 7, 2023, the PLUM Committee adopted the CPC's recommendation [amended by Motions from Council Districts 1, 2, 5, and 13] and requested the City Attorney's Office to transmit the final draft ordinances.

The City Planning Commission has thus not reviewed the final draft Ordinances as amended by Motions from Council Districts 1, 2, 5, and 13, something that is clearly needed given the inconsistencies in the Ordinances. Pursuant to part (b) of City Charter Section 558 – Procedure for Adoption, Amendment or Repeal of Certain Ordinances, Orders and Resolutions:

(b) Procedures for the adoption, amendment or repeal of ordinances, orders or resolutions described in subsection (a) shall be prescribed by ordinance, subject to the following limitations:

(1) *Initiation.* An ordinance, order or resolution may be proposed by the Council, the City Planning Commission, or Director of Planning or by application of the owner of the affected property if authorized by ordinance.

(2) *Recommendation of the City Planning Commission.* After initiation, the proposed ordinance, order or resolution shall be referred to the City Planning Commission for its report and recommendation regarding the relation of the proposed ordinance, order or resolution to the General Plan and, in the case of proposed zoning regulations, **whether adoption of the proposed ordinance, order or resolution will be in conformity with public necessity, convenience, general welfare and good zoning practice.** The City Planning Commission shall act within the time specified by ordinance. After the City Planning Commission has made its report and recommendation, or after the time for it to act has expired, the Council may consider the matter. Failure to act within the time prescribed by ordinance shall be deemed to be a recommendation of approval by the City Planning Commission of the proposed ordinance, order or resolution.

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<sup>10</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_rpt\\_atty\\_12-01-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_rpt_atty_12-01-23.pdf)

(3) *Action by the Council.* Before adopting a proposed ordinance, order or resolution, the Council shall make the findings required in subsection(b)(2) of this section.

(A) *Planning Commission Recommendation of Approval.* If the City Planning Commission recommends approval of the proposed ordinance, order or resolution, the Council **may adopt an ordinance, order or resolution conforming to the Commission recommendation by majority vote.**

(B) *Planning Commission Recommendation Against Approval.* If the City Planning Commission recommends against approval of the proposed ordinance, order or resolution, and the matter has been initiated by the filing of an application, the City Planning Commission action shall be final, subject to appeal to the Council in accordance with procedures prescribed by ordinance. The Council shall review the action of the Commission appealed from and may adopt an ordinance, order or resolution contrary to the recommendation of the Commission only by a two-thirds vote. If the City Planning Commission recommends against approval of the proposed ordinance, order, or resolution, and the matter has been initiated by the Council, the Council may take action on the matter without an appeal. The Council may adopt the proposed ordinance, order or resolution only by a two-thirds vote.

(C) *Failure of Planning Commission to Act.* If the Commission fails to make any recommendation within the time specified by ordinance, an ordinance, order or resolution in conformity with that which was initiated by the Council or by application shall be prepared and presented to the Council, and may be adopted by majority vote.

In this instance, the Planning Commission acted and recommended approval of the Program. However, PLUM is considering recommending to Council ordinances that do not conform to the Commission's recommendation. The Council therefore cannot make the findings required by City Charter Section 558(b)(3) because the City Planning Commission has not reviewed the modified Ordinances which contain important changes from the Commission's recommendation, and the matter was never referred back to the CPC for review. It should be noted that the CPC, after detailed debate and discussion, which is documented in the Transcript from the CPC meeting included as Attachment 1 to the Channel Law letter dated November 7, 2023<sup>11</sup> and incorporated herein, made specific recommendations regarding Program hours of operation, sign take-down ratio, sign spacing and distances, and years of contract duration, which have

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<sup>11</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_11-07-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_11-07-23.pdf)

been overridden by PLUM without evidence to support the changes made.<sup>12</sup> The Ordinance for Section 13.11.1 of the LAMC now specifies:

## 2. Prohibited Locations.

- a. No Freeway Facing Sign or Non-Freeway Facing Sign shall be located within **200 feet** of an ecological preserve as defined by California Fish and Wildlife Code Section 1584 or a state or national park.
- b. The face of any Freeway Facing Sign or Non-Freeway Facing Sign shall be oriented away from residential zones in areas subject to Chapter 1 of the Code or, in areas subject to Chapter 1A of the Code, Residential Use Districts pursuant to Division 5B.3 (Residential Districts) of Article 5 (Use) of Chapter 1A, that are located within **200 feet** of such Sign, including residential zones or Residential Use Districts across an adjoining alley or street.
- c. Freeway Facing Signs and Non-Freeway Facing Signs shall not be located on a site within **200 feet**, as measured from the centerline of a roadway designated as a scenic highway, scenic parkway, scenic corridor or scenic route as designated by the State of California Department of Transportation or an element of the General Plan.
- d. TCN Support Structures with a Digital Display(s) shall be at least **1000 feet** away from any other digital Off-Site Sign with a Digital Display on the same side of any portion of a Freeway for Freeway-Facing Signs or on the same side of any portion of a roadway other than a Freeway for Non-Freeway Facing Signs. The foregoing shall not be construed to prohibit Off-Site Signs with double-faced Digital Displays oriented toward opposing directions of the Freeway or

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<sup>12</sup> The CPC recommended 125 take-downs prior to any freeway facing digitals being installed (with another 75 at some point to get to the 200 agreed upon in the MOA). PLUM changed it to 50 removals prior to any freeway facing digitals being installed with 4 signs being taken down for every structure going up. This doesn't seem to add up to 200 let alone account for the takedowns recommended by CPC prior to any signs being installed. City Staff confirmed that the 200 takedown number came from the MOA. CPC recommended removal of FF-3. Staff said the distance was too close to other signs and it would set a bad precedent for future sign placement. CPC extended the distance requirement for this sign and future signs. PLUM reduced the distance allowing the sign back into the Program. Councilmember Yaroslavsky moved at PLUM to reduce the distance between signs from the CPC-recommended 2,640 to 1,500 allowing a downtown sign that is at a multi-lane interchange to remain part of the Program, that CPC and planning staff requested be removed, and paving the way for future downtown signs to be closer together than Planning recommended. The Ordinance further reduces the distance to 1,000 feet. PLUM also made changes to hours of operation for freeway facing signs with PLUM extending sign hours along freeways from what CPC recommended.

roadway other than a Freeway. Compliance will be verified with measurements taken between the TCN Support Structures or other applicable Off-Site Signs with a Digital Display(s). (Emphasis added).

No substantial evidence has been provided to show that the reduced distances provided in the Ordinance are protective of the general welfare, are mandated by public necessity, or represent good zoning practice. These distances seem solely designed to serve the convenience of the billboard owners, operators, and clients. Moreover, PLUM has failed to refer the matter back to the CPC for reconsideration and a public hearing on the changes, and to make sure the changed Ordinances are accurate and internally consistent, which they are not.

Furthermore, the Council cannot make the findings required by Charter Section 558(b)(2) that the “ordinance, order or resolution will be in conformity with public necessity, convenience, general welfare and good zoning practice” as detailed in the administrated record, incorporated herein by reference, this letter, and for the reasons detailed in the Channel Law letter dated November 7, 2023,<sup>13</sup> also incorporated herein. Nothing about this Program is a public necessity, aspects are contrary to the general welfare and the Ordinances violate good zoning practice. Furthermore, in failing to refer the matter back to the Planning Commission, the City has deprived the public of meaningful opportunity to comment on the revised Ordinances.

In addition, it appears that the City is violating Municipal Code (“LAMC”) Section 12.32 – Land Use Legislative Actions by failing to properly notice a hearing for consideration of these modified Ordinances. It has done so in part by failing to refer the matter back to the Planning Commission. Subsection 4 of LAMC Section 12.32 requires:

**4. Notice. (Amended by Ord. No. 173,754, Eff. 3/5/01.)** Notice of the time, place and purpose of the public hearing shall be given in the following manner for land use ordinances proposed by applications or initiations:

(a) By at least one publication in a newspaper of general circulation in the City, designated for that purpose by the City Clerk, not less than 24 days prior to the date of the hearing.

(b) By mailing written notice at least 24 days prior to the date of the hearing, to the applicant, to the owner or owners of the property involved and to the owners of all property within and outside the City that is within 500 feet of the area proposed to be changed as shown upon the records of the City Engineer or the records of the County Assessor. Written notice shall also be mailed to residential,

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<sup>13</sup> [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_11-07-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_11-07-23.pdf)

commercial and industrial occupants of all property within 500 feet of the exterior boundaries of the property involved. This requirement can be met by mailing the notice to "occupant". If this notice provision will not result in notice being given to at least 20 different owners of at least 20 different parcels of property other than the subject property, then the 500-foot radius for notification shall be increased in increments of 50 feet until the required number of persons, and parcels of property are encompassed within the expanded area. Notification shall then be given to all property owners and occupants within that area. **(Amended by Ord. No. 181,595, Eff. 4/10/11.)**

(c) If there is an applicant, by the applicant posting notice of the public hearing in a conspicuous place on the property involved at least ten days prior to the date of the public hearing. If a hearing officer is designated to conduct the public hearing then the applicant, in addition to posting notice of the public hearing, shall also post notice of the initial Commission meeting on the matter. This notice shall be posted in a conspicuous place on the property involved at least ten days prior to the date of the meeting.



PhotoSim of FF-06. Source: [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_3100\\_10-30-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_3100_10-30-23.pdf)

## **The City's Failure to Act As Lead Agency Has Deprived the Public and Neighborhood Councils With Adequate Ability to Participate in the Administrative Process**

If the City has acted as the Lead Agency, the Neighborhood Councils (“NC”) would have received environmental notices and a much earlier and more complete ability to comment on the Program and affect its development. The City Charter requires Neighborhood Councils to get early notice and opportunity for input into City land use Policy.<sup>14</sup> City of Los Angeles Department of City Planning Technical Bulletin 13, which provides for the implementation of Charter NC participation and early notice provisions states:<sup>15</sup>

### **Public Outreach**

The Department will engage the public in the development of preliminary staff recommendation reports before they are presented to the City Planning Commission. Different points of view will be considered. The method of engagement will generally include public workshops, small group meetings, stakeholder meetings, and other appropriate public participation methods, including web-based methods. The public engagement process will enable staff to gain a better understanding of the issues, to weigh the policy options, and to hear and respond to the public's specific concerns and issues. During this process, staff will present and discuss initial proposals, concepts and ideas, and solicit feedback before arriving at a preliminary recommendation. The level and type of public engagement used will be tailored to the complexity and significance of the issue, existing policy on the matter, the new policy options that should be examined, and the points of view that should be considered.

### **Preliminary Staff Recommendation Report**

Staff will release a preliminary staff recommendation report at least 60 days before the matter is calendared before the City Planning Commission. A hearing officer appointed by the Director of Planning will also conduct a public hearing on the preliminary staff recommendation report. During this 60-day review period, the public will have the opportunity to comment on the preliminary report.

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<sup>14</sup> Requirements for establishing procedures for receiving input from neighborhood councils *prior* to decisions by City commissions are specified in City Charter Sec. 90.

<sup>15</sup> Technical Bulletin #13 is available at: <https://www.dropbox.com/scl/fi/675wkzgritne0tmqbo7jq/Public-Participation-Policy-TB-13.pdf?rlkey=f1z2s4n5ht4jsw7eltsuxv2ls&dl=0>

### Final Staff Recommendation Report

At the end of the 60-day comment period, staff will review and consider all written and other public comments and the testimony received at the public hearing. Based on this review and consideration, staff may revise the preliminary staff recommendation report. The final staff recommendation report will be released to the public at least two weeks before the City Planning Commission hearing date.

Because Metro was the Lead Agency, NCs were not notified about the Program by the City and did not have the opportunity to weigh-in until after the EIR was certified. Furthermore, Councilmembers have changed and new Councilmembers who were not involved in the decision to enter into an MOA with Metro are now being asked to make decisions regarding this Program. In addition, Councilmembers Bonin and Koretz, the only representatives from the City or City staff to comment on the EIR (Councilmember Bonin on the NOP and Councilmember Koretz on the DEIR), are both no longer with the City. If the City had acted as Lead Agency, the City Planning Department, NCs, and Council would have been involved at a point where denial of the Program remained a real possibility.

### **3. ADDITIONAL SIGNS THAT SHOULD BE CONSIDERED FOR REMOVAL FROM THE PROGRAM**

**Attachment A** to this letter provides a review of each of the 75 non-contiguous digital billboards: 54 freeway-facing and 21 non-freeway facing signs on 43 digital billboard structures (30 freeway-facing [with 54 faces + 5 art faces] and 13 non-freeway facing [with 21 faces + 5 art faces]) for a total of 45,500 square feet of total sign area. For each billboard structure, **Attachment A** provides information on: the Community Plan, the Neighborhood Council, the Council District, the square footage, height and number of sign faces; the APN numbers; the zoning, and the General Plan land use designation.

By way of assisting the City in identifying problematic sign locations, **Attachment A** also indicates for each billboard structure:

- whether the sign structure would be on a site identified in the Mayor's Executive Directive and/or a Metro Joint Development site to be reviewed for eligibility for housing;<sup>16</sup>

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<sup>16</sup> <https://mayor.lacity.gov/sites/g/files/wph2066/files/2023-03/ED%203%20-%20Emergency%20Use%20of%20Viable%20City-Owned%20Property.pdf>

[https://wpstaticarchive.lacontroller.io/wp-content/uploads/2021/12/City-Properties-Available-for-Homeless-Housing-and-Services\\_1.12.22.pdf](https://wpstaticarchive.lacontroller.io/wp-content/uploads/2021/12/City-Properties-Available-for-Homeless-Housing-and-Services_1.12.22.pdf)

- its proximity to residential uses (and thus whether it should be subject to vertical louver requirements);
- its proximity to the LA River;
- whether the site is designated as an historic resource or proximate to an historic resource;
- whether the site is on the High Injury Network;
- whether the site is within 500 feet of a Scenic Highway;
- whether it is within 500 feet of a park or ecological reserve; and
- whether the site is zoned Public Facility

As can be seen from a review of **Attachment A**, the majority of the remaining billboard structure locations are problematic for one or more of these reasons, and would therefore result in significant environmental impacts, which have not been adequately addressed in the FEIR or City's Addendum for the Program. They are also contrary to public necessity and the general welfare.

### **Sites Identified Pursuant To The Mayor's Executive Order As Housing Eligible Sites**

As shown on the following table, six of the sign sites have been identified by the City as possible housing sites, pursuant to the Mayor's Executive Directive No. 1 ("ED1"),<sup>17</sup> and five had been identified by Metro for housing, but one billboard was removed from the Program during the PLUM hearing leaving four sites.<sup>18,19</sup>

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<sup>17</sup> <https://planning.lacity.org/odocument/d595b164-5df4-4d37-8b88-1f74d5b88766>

On December 16, 2022, Mayor Karen Bass issued Executive Directive 1 (ED 1) to facilitate the expeditious processing of Shelter projects and 100 Percent Affordable Housing Projects to address the housing and homelessness crisis in Los Angeles. ED 1 was then revised on June 12, 2023. Eligible projects receive expedited processing, clearances, and approvals through the ED 1 Ministerial Approval Process. The City's ZIMAS database for each parcel contains a tab called Planning and Zoning. Under that tab, there is a key for ED1 Eligibility, which indicates whether the parcel is an ED1 Eligible Site. Per ZIMAS, ED 1 Eligibility ZIMAS Designations include: "*Eligible Site*": ED 1 may be applied to a shelter or 100% Affordable Housing Project on the site; "*Not Eligible*": ED 1 may not be applied to a project on the site; and, "*Review Eligibility*": The zoning and land use designations on the site need to be further reviewed to determine whether ED 1 may be applied to a shelter or 100% Affordable Housing Project on the site.

<sup>18</sup> <https://www.dropbox.com/scl/fi/t1wwdy1qcvtpcs2guodr/Board-Report-Metro-March-2023.pdf?rlkey=fxjmrjq1xk7bu373sqhukqmjr&dl=0>  
And, <https://www.dropbox.com/scl/fi/wwhyws0c7i5n4oramoyph/Attachment-C-Potential-Joint-Development-Sites.pdf?rlkey=ilybz6170tctlowdevilq2fbg&dl=0>

<sup>19</sup> FF-4 was removed from the Metro TCN Program during the PLUM hearing at the request of Councilmember Hernandez. Her letter to the record states, "Freeway facing Site FF-04 in our Council District, located on Temple St. and Beaudry Ave., is a Metro owned joint use development site where construction has not commenced. While our office appreciates the letter that Metro drafted which stated that they promise to work with our Council Office in order to remove the TCN structure when future housing is built, there is no clear pathway or process that was delineated to actually remove the structure.

The use of sites identified by either the City or Metro as sites for future affordable or homeless housing provision is thus contrary to public necessity and the general welfare. Signs at these locations should be removed from the Program.

	<b>Location</b>	<b>Housing Directive</b>	<b>Sign</b>
1	Northwest corner of Lankershim Boulevard and Universal Hollywood Drive	Metro Joint Development Site Mayor's Executive Order	<b>NFF-4 CD-2</b>
2	Southwest corner of Lankershim Boulevard	Metro Joint Development Site Mayor's Executive Order	<b>NFF-5 CD-2</b>
3	Southwest corner of 4th Street and Hill Street	Mayor's Executive Order	<b>NFF-6 CD-14</b>
4	Southeast corner of Alameda Street and Commercial Street	Mayor's Executive Order	<b>NFF-8 CD-14</b>
5	Southeast corner of Sepulveda Boulevard and Erwin Street	Metro Joint Development Site	<b>NFF-10 CD-6</b>
6	Century Boulevard, 152 feet West of Aviation Boulevard	Metro Joint Development Site	<b>NFF-17 CD-11</b>
7	Northwest corner of Vermont Avenue and Beverly Boulevard	Mayor's Executive Order	<b>NFF-19 CD-13</b>
8	US-101 North Lanes, Northwest of Lankershim Boulevard	Mayor's Executive Order	<b>FF-5 CD-2</b>

The following additional sites have been identified for ED1 review of housing eligibility: FF1-3, FF5-8, FF10-11, FF15-21, FF23, FF25-28, FF32-34, NFF9-10 and NFF13. The Program should not be approved, and the list of signs should not be finalized, until these locations have been fully evaluated for housing usage.

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For this reason, we recommend removing site FF-04 from the City's list of TCN site locations today." See: [https://clkrep.lacity.org/online/docs/2022/22-0392\\_misc\\_cd1\\_11-07-23.pdf](https://clkrep.lacity.org/online/docs/2022/22-0392_misc_cd1_11-07-23.pdf)



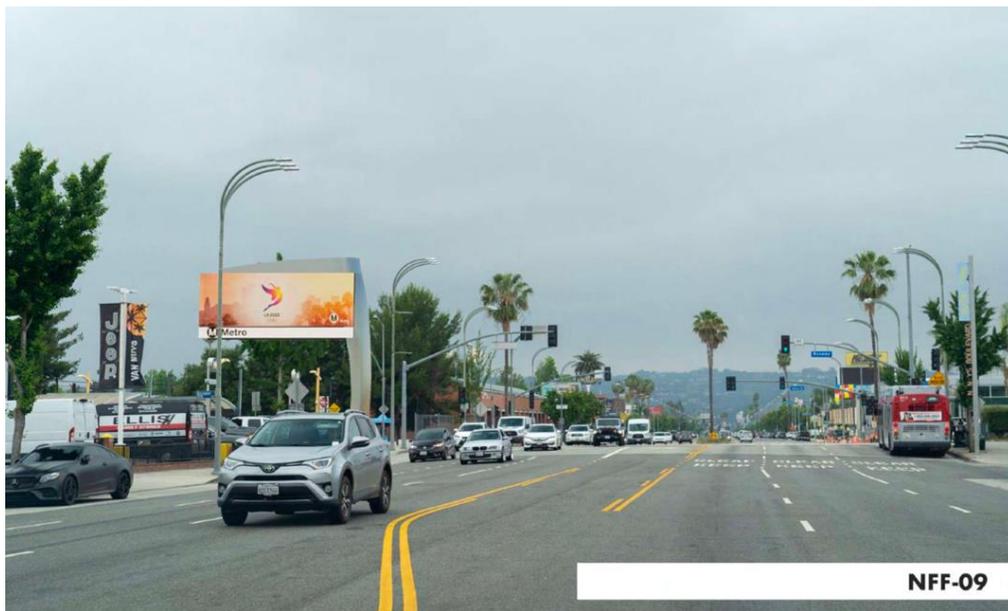
PhotoSim of FF-32. Source: [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_3100\\_10-30-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_3100_10-30-23.pdf)

### **Sites On The High Injury Network**

After PLUM approval and City Attorney review, there are now 9 of 13 non-freeway facing digital billboards that will be located on the City's High Injury Network (“HIN”) streets and should therefore be removed from the Program due to safety and public welfare concerns:

	<b>NFF Billboards That Would Be Located On High Injury Network (“HIN”) Streets</b>	Signs	Council District
1	Southeast corner of Alameda Street and Commercial Street	NFF-8	CD-14
2	Northeast corner of Van Nuys Blvd and Orange Line Bus line	NFF-9	CD-6
3	Southeast corner of Sepulveda Blvd and Erwin Street	NFF-10	CD-6
4	Southwest of Crenshaw Blvd, 175 feet South of 67th Street	NFF-11	CD-8
5	Southeast corner of Crenshaw Blvd and Exposition Blvd	NFF-12	CD-10
6	Southeast corner of East Cesar Chavez Avenue and North Vignes Street	NFF-13	CD-14
7	Century Blvd, 152 feet West of Aviation Blvd	NFF-17	CD-11

	<b>NFF Billboards That Would Be Located On High Injury Network (“HIN”) Streets</b>	Signs	Council District
8	Southwest Aviation Blvd and South of Arbor Vitae Street	NFF-18	CD-11
9	Northwest corner of Vermont Avenue and Beverly Blvd	NFF-19	CD-13
	<b>NFF Billboard Approved on Non-High Injury Network Streets</b>		
10	Northwest corner of Lankershim Blvd and Universal Hollywood Drive	NFF-4	
11	Southwest corner of Lankershim Blvd and Universal Hollywood Drive	NFF-5	
12	Southwest corner of 4th Street and Hill Street	NFF-6	
13	Northwest corner of East 7th Street and South Alameda Street	NFF-22	



PhotoSim of NFF-09 on an HIN Street. Source:  
[http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_3100\\_10-30-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_3100_10-30-23.pdf)

The EIR for the Program included minimal information on the City’s Vision Zero Program, a citywide effort, implemented by the Los Angeles Department of Transportation (LADOT) to eliminate traffic deaths in the City by 2025. As part of the Vision Zero Program the City identified roadways which constituted a High Injury

Network. The Department of City Planning's Recommendation Report for the TCN Program failed to accurately disclose the number of proposed TCN structures that are in close proximity to roadways identified by Vision Zero as being on the City's High Injury Network (HIN), the roadway segments in the City that have high fatality and/or injury rates. The Department of City Planning's Recommendation Report for the Program downplayed the location of billboard structures on the HIN, stating:<sup>20</sup>

In October 2022, the Department of City Planning met with LADOT to discuss the transportation impact portion of the Draft EIR that was prepared as part of this project by Metro. The discussion centered on the scale and scope of the Metro TCN project as well as the analysis undertaken for EIR. The conversation also provided information to staff about the priorities of the City's Vision Zero program and the High-Injury Network, which consists of roadway segments in the City that have high fatality and/or injury rates. **It was noted that a few of the proposed TCN structures are in close proximity to some of those roadways identified by Vision Zero and the High Injury Network.** (Emphasis added).

In fact, 16 of the 22 proposed non-freeway facing TCN Structures [adjusted to 11 of 16 following CPC determination, and 9 of 13 following PLUM action] would be located adjacent to a street on the HIN. Rather than eliminate TCN Structures on the HIN network, Planning recommended instead to:<sup>21</sup>

As a way to better understand the interaction of the proposed Metro TCN project with the existing City Vision Zero policies, a Plan Approval or Project Review process was incorporated into the Ordinance in an effort to collect and analyze the TCN structures operational data against collected collision data after five years of operation. Metro would be the applicant and submit this data to LADOT for analysis and provide City Planning with its findings and whether any operational changes may be warranted. Substantive change to the operations would require that the data show a causal relationship between roadway incidents and TCN structures; however, the primary focus of the Plan Approval process is the unprecedented opportunity to collect localized citywide data and analysis that can inform future extensions of the MOA and Metro TCN Ordinance as well as other digital billboard projects.

Once LADOT submits its analysis and conclusions to City Planning, a hearing may be initiated where public testimony may be provided as well as any further information or context from Metro. Any decision stemming from this analysis would be detailed in a letter of

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<sup>20</sup> See page A-12 to 13: [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_300\\_10-26-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_300_10-26-23.pdf)

<sup>21</sup> Ibid.

determination and would be appealable to the City Planning Commission for further consideration and deliberation.

This concept has been incorporated into the Section 13.11.1 Ordinance as follows:<sup>22</sup>

**D. Plan Approval and Five-Year Update.** No later than five (5) years from the date of the issuance of a final permit for the Transportation Communication Network Program as authorized by this Ordinance, the applicant shall file a Plan Approval application for review by the Zoning Administrator pursuant to the procedures set forth in Section 12.24 M of Chapter 1 or, when applicable, Section 13B.6.1 (Evaluation of Non-Compliance) of Chapter 1A of the Code for Non-Freeway Facing Signs. The operator shall collect annual collision data where the Digital Displays are visible to motorists over the five-year period. The Los Angeles Department of Transportation (LADOT) will review the collision data and provide recommendations to the Director of City Planning with respect to the Plan Approval application. Upon this review, the Director may modify, add or delete conditions; and, if warranted, require changes to the illumination standards, refresh rate, hours of operation, or other operational standards in this Ordinance.

The Ordinance thus provides no requirement that TCN structures on the HIN network be removed, should an increase in accident rate be observed. In addition, no action would be taken to protect the public for at least five years. The Program's inclusion of TCN structures on the HIN network and the "protections" provided in the City's Ordinance(s) for the TCN Program are thus contrary to the general welfare.

Recently, the City of La Mesa rejected digital billboards in a surprise vote because "a majority of the City Council felt the extra revenue wouldn't make up for potentially distracting drivers."<sup>23</sup> The City of Los Angeles should demonstrate the same concern for the general welfare of its citizens.

### **Sites Designated As Historic Or Proximate To An Historic Resource**

The following three digital billboard locations are designated Historic Cultural Monuments and should therefore be removed from the Program. Additionally, **NFF-6 (CD14)** is across from landmark Angels Flight® Railway and should therefore also be removed from the Program. For the signs listed below, ZIMAS shows that for Historic

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<sup>22</sup> See page 8 of the Ordinance.

<sup>23</sup> Blake Nelson, *La Mesa rejects digital billboards in surprise vote*, San Diego Union Tribune, August 7, 2023, available at: <https://www.sandiegouniontribune.com/communities/east-county/story/2023-08-07/la-mesa-rejects-digital-billboards-in-surprise-vote>

Preservation review is required, yet the EIR for the Program fails to adequately address the likely historic resource impacts of locating signs at these locations:

- **FF-1: US-101 North Lanes at Union Station, 800 N Alameda Street (CD14) -** This is a designated historic resource and requires historic preservation review. It is City of Los Angeles Monument No. LA-101, Los Angeles Union Station Passenger Terminal and Grounds, 800-850 North Alameda Street and 357 Aliso Street, listed August 2, 1972. The Status Code is 1S: Listed in NR as an individual property. National Register Designation or Eligibility Los Angeles Union Station Passenger Terminal, listed November 13, 1980. Per Zimas:<sup>24</sup>

No permit shall be issued for any addition, alteration, construction, demolition, reconstruction, rehabilitation, relocation or removal of any building, structure, landscaping, or natural feature of the property prior to obtaining a written clearance from Los Angeles City Planning, Office of Historic Resources.

If the proposed project complies with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards), a Notice of Exemption will be required for project clearance. If the proposed project does not comply with the Standards, the applicant shall be referred to Los Angeles City Planning, Environmental Review Section.

Please contact City Planning Office of Historic Resources at (213) 847-3676, 221 N. Figueroa Street, Suite 1350. Appointments are recommended for project clearances.

- **FF-6: I-5 South Lanes at North Avenue 19 (CD-1) -** This is a designated historic resource and requires historic preservation review. It is City of Los Angeles Monument No. LA-908, Riverside-Figueroa Bridge, Bridge #53C0160, listed January 30, 2008.<sup>25</sup>
- **FF-11: I-10 East Lanes and Exit Ramp to SR-60 and I-5 (CD-14) -** This is a designated historic resource and requires historic preservation review. It is City of

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<sup>24</sup>

<https://zimas.lacity.org/hpoz.aspx?pin=132A215%20%20%20%2065&tab=1&splash=&address=800%20N%20ALAMEDA%20ST&print=Yes&timestamp=Mon%20Dec%2004%202023%2006%3A27%3A33%20GMT-0800%20%28Pacific%20Standard%20Time%29>

<sup>25</sup>

<https://zimas.lacity.org/hpoz.aspx?pin=132A215%20%20%20%2065&tab=1&splash=&address=800%20N%20ALAMEDA%20ST&print=Yes&timestamp=Mon%20Dec%2004%202023%2006%3A32%3A32%20GMT-0800%20%28Pacific%20Standard%20Time%29>

Los Angeles Monument No. LA-902, Olympic Street Bridge, #53C0163, listed January 30, 2008.<sup>26</sup>

**Sites Proximate To The LA River, A Park Or Ecological Reserve**

As detailed in **Attachment A**, the following sign locations are located within 500 feet of the Los Angeles River, a park, recreational, tourist, Wildlife or Ecological Reserve and should therefore be removed from the Program as they represent blight on these areas, are contrary to public enjoyment of these areas and thus the public welfare, and serve no public necessity:

<b>Within 500 Feet Of:</b>	<b>Sign</b>	<b>Council District</b>
Across from landmark Angels Flight® Railway	NFF-6	CD-14
Los Angeles Plaza Park	FF-1	CD-14
South Weddington Park	FF-5	CD-2
Elysian Park and LA River	FF-6	CD-1
Elysian Park and LA River	FF-7	CD-1
The Los Angeles River	FF-10	CD-14
The Los Angeles River	FF-11	CD-14
Sun Valley Recreation Center	FF-18	CD-6
Sepulveda Wildlife Reserve <sup>27</sup> and Woodley Park	FF-25	CD-6
Ballona Wetlands, an Ecological Reserve per California Fish and Wildlife Code Section 1584 <sup>28</sup>	FF-30	CD-11
South Weddington Park and Campo De Cahuenga	NFF-4	CD-2
South Weddington Park and Campo De Cahuenga	NFF-5	CD-2
Woodley Park and Sepulveda Basin Recreation Area	NFF-10	CD-6
Scenic Highway	NFF-12	CD-10

<sup>26</sup> <https://zimas.lacity.org/hpoz.aspx?pin=121-5A219%20%2034&tab=1&splash=&address=undefined&print=Yes&timestamp=Mon%20Dec%2004%202023%2006%3A20%3A03%20GMT-0800%20%28Pacific%20Standard%20Time%29>

<sup>27</sup> <https://www.sfvaudubon.org/birding-spots/sepulveda-basin-wildlife-area/>

<sup>28</sup> <https://wildlife.ca.gov/Lands/Places-to-Visit>

The City has failed to justify the continued inclusion of these locations in the Program. As noted on page A-17 of the Planning Department Recommendations, the Department recommended, and the City Planning Commission concurred with, removal of the Bowtie Park signs which, at 600 and 800 feet from the Park, were further away, stating:<sup>29</sup>

1. Removal of the proposed TCN Structures at CA-2 Northbound and Casitas Avenue (FF-14, APN: 54420001900) as well as CA-2 Southbound and Casitas Avenue (FF-13, APN: 5436033906).
  - o The proposed TCN structures along the CA 2 Freeway and adjacent to the Los Angeles River should be considered for removal based on public feedback and their proximity to natural resources of regional significance. Furthermore, the sites are within close proximity to the Bowtie parcel along the Los Angeles River which is currently planned to become part of the California state park system. Although the certified EIR integrated proper mitigation for these sites, and overriding considerations were not necessary, Department staff recommends removal of the sites because of their proximity to these natural resources. In addition, the California Department of Parks and Recreation (CDPR) has also requested that FF-13 and FF-14 not be erected in light of the fact that the Bowtie Wetland Demonstration Project is currently being developed in partnership with The Nature Conservancy.

The remaining TCN sites which are in close proximity to natural resources and parkland of regional significance should similarly be removed from the Program. The City has failed to provide adequate justification for using 500 feet<sup>30</sup> as the threshold for mitigating impacts from digital signs in these types of sensitive locations instead of removing them completely as the City recommended for the Bowtie signs.

At a minimum, vertical louvers should be required at each of these sites. However, it does not appear that the City has required vertical louvers for signs FF-1,

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<sup>29</sup> See page A-17: [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_300\\_10-26-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_300_10-26-23.pdf)

<sup>30</sup> The Ordinance for LAMC Section 13.11.1 under Prohibited Locations specifies: "c. Freeway Facing Signs and Non-Freeway Facing Signs shall not be located on a site within 200 feet, as measured from the centerline of a roadway designated as a scenic highway, scenic parkway, scenic corridor or scenic route as designated by the State of California Department of Transportation or an element of the General Plan." This is a violation of the Mobility Element of the General Plan. The Director of Planning's Report specifies 500 feet.

FF-18 and NFF-10 despite CPC's recommendation and the Director of Planning's memo to PLUM dated November 1, 2023, which states:<sup>31</sup>

Planning staff has identified two categories of sensitive receptors, see *Tables 1 and 2 below*, in which additional vertical louvers should be considered. These include existing residential uses (at the time of this analysis) and existing open space including; city parks, rivers, and natural habitat. Upon analyzing the surrounding uses within 500 feet of the 44 locations proposed to have horizontal louvers only, staff recommends an additional 22 TCN locations that are recommended to include vertical louvers, this includes both single- and double-sided digital displays.

It should be noted that Planning used the more justifiable 500-foot distance when making these recommendations. We have conducted a proximity analysis using the ZIMAS radius map tool in order to determine signs within 500 feet of parks. Based on our analysis signs FF-1, FF-18 and NFF-10 would be within 500 feet of a park and should therefore require vertical louvers. The City must amend their list of signs requiring louvers accordingly.

### **Signs Which Conflict With the General Plan**

Two of the TCN sites conflict with the General Plan. These sites are NFF-2 and FF-30. These sites must be removed from the Program, as including them in the Ordinances in the absence of General Plan amendments would be a violation of State law as detailed in the Channel Law letter of November 7, 2023.

#### **NFF-2**

The location of NFF-12 is within 500 feet of the centerline of a scenic highway which violates the Mobility Element of the General Plan. Metro's attorneys submitted a letter to the record stating they would not object to this sign's removal. Yet, the sign remains. The City has no justification for including a sign at this location, and NFF-12 should therefore be removed from the Program.

#### **FF-30**

The Program should be modified to remove TCN site FF-30 which is located adjacent to the Ballona Wetlands, which is an Ecological Reserve per California Fish and Wildlife Code Section 1584. The following provision in the Section 13.11.1 Ordinance regarding allowing signs within 200 feet of an ecological preserve cannot be justified:<sup>32</sup>

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<sup>31</sup> Page 2, [https://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_3\\_11-02-23.pdf](https://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_3_11-02-23.pdf)

<sup>32</sup> Ordinance page 16.

## **2. Prohibited Locations.**

- a. No Freeway Facing Sign or Non-Freeway Facing Sign shall be located within 200 feet of an ecological preserve as defined by California Fish and Wildlife Code Section 1584 or a state or national park.

When Metro adopted the TCN Program, it included five signs they acknowledged would have significant and unavoidable impacts on the community. The City removed four of the five signs, but the sign immediately adjacent to and which will be visible from the Ballona Wetlands Ecological Reserve (FF-30) has inexplicably not be removed. The Ballona Wetlands are a designated ecological preserve. Metro should have, but did not, seek input from the Department of Fish and Wildlife regarding the aesthetic and biological impacts to visitors and wildlife of having illuminated advertising in such close proximity to the Ecological Preserve. The Ballona Wetlands are also a critical coastal resource under the jurisdiction of the California Coastal Commission. Both the resources themselves and the views of those resources from public roads are protected. Metro acknowledged this sign would have significant and unavoidable impacts on the surrounding environment, yet they approved it anyway, and the City has yet to correct this error.

A comment from the Del Rey Resident Association's Aug.1, 2022 submission in response to the Metro TCN DEIR re: lighting and impacts on Ballona wetlands stated: "Our comments on the TCN Initial Study noted that a digital sign on a business at 5450 Lincoln Boulevard (in Del Rey) is clearly visible from the other side of the Ballona Wetlands (about 1.5 miles away)."

DEIR page IV.1-24 indicates that: ". . . due to the Project's inconsistencies with the goals and policies of the . . . Palms – Mar Vista – Del Rey Community Plan policy regarding placement of off-site commercial advertising in coastal areas resulting from Site Locations FF-29 and FF-30, the Project would substantially conflict with applicable goals, objectives, and policies set forth in the Community Plans and would, therefore, result in significant impacts." Adopting zoning which overrides a Community Plan would be a violation of State law as detailed in the Channel Law letter of November 7, 2023.

Although the City has removed FF-29 from the Project under consideration according to the Addendum, FF-30 and its significant land use impact remains. This is a significant unmitigated General Plan consistency impact that would be avoided through elimination of FF-30.

### **Sites With A Public Facility Zoning Designation**

The following sites are zoned for Public Facilities, and therefore should not be included in the Program:

	<b>Public Facilities Zoned Parcels (FF)</b>	<b>Zoning</b>	<b>Signs</b>
1	US-101 South Lanes at Center Street	<u>PF-1XL-RIO</u>	FF-2
2	US-101 North Lanes at Keller Street	<u>PF-1XL-RIO</u>	FF-3
3	I-5 South Lanes at North Avenue 19	General Plan: PF	FF-6
4	I-5 North Lanes at San Fernando Road	[Q]PF-1-CDO-RIO	FF-7
5	I-5 South Lanes and Exit Ramp to I-10	PF-1XL-CUGU	FF-8
6	I-10 West Lanes and Entrance Ramp from I-5	General Plan: PFF	FF-10
7	I-10 East Lanes and Exit Ramp to SR-60 and I-5	General Plan: PFF	FF-11
8	SR-170 South Lanes at Raymer Street	<u>PF-1VL</u>	FF-15
9	SR-170 North Lanes North of Sherman Way	<u>PF-1VL</u>	FF-16
10	I-5 North Lanes South of Tuxford Street	<u>PF-1XL-CUGU</u>	FF-17
11	I-5 South Lanes South of Tuxford Street	<u>[Q]PF-1XL-CDO-CUGU</u>	FF-18
12	SR-118 East of San Fernando Road	PF-1XL-CUGU	FF-19
13	SR-118 West of San Fernando Road	PF-1XL-CUGU	FF-20
14	I-110 South Lanes at Exposition Boulevard	<u>PF-1</u>	FF-21
15	I-5 North Lanes at San Fernando Road	<u>PF-1VL</u>	FF-22
16	I-110 North Lanes at Exposition Boulevard	<u>PF-1</u>	FF-23
17	I-5 South Lanes at San Fernando Road and Sepulveda Boulevard	<u>PF-1</u>	FF-24
18	I-405 South Lanes at Victory Boulevard	<u>PF-1XL-RIO</u>	FF-25
19	I-405 North Lanes at Exposition Boulevard	<u>PF-1XL</u>	FF-26
20	SR-90 West at Culver Boulevard	<u>PF-1XL</u>	FF-30
21	I-105 East Lanes at Aviation Boulevard	<u>PF-1XL</u>	FF-32

22	I-110 South Lanes at Slauson Avenue	<u>PF-1</u>	FF-33
23	I-110 North Lanes at Slauson Avenue	<u>PF-1</u>	FF-34
	<b>Public Facilities Zoned Parcels (NFF)</b>	<b>Zoning</b>	Signs
24	Northeast corner of Van Nuys Boulevard and Orange Line Bus line	<u>PF-1XL</u>	NFF-9
25	Southeast corner of Sepulveda Boulevard and Erwin Street	<u>PF-1-RIO</u>	NFF-10
26	Southeast corner of Crenshaw Boulevard and Exposition Boulevard	<u>PF-1</u>	NFF-12

As can be seen from the table, many parcels in the Program are zoned Public Facilities (PF) land where digital billboard/commercial advertising is not a permitted use. PF parcels are zoned for projects that serve a public purpose, for example, transit, schools, libraries and other projects that benefit the public. The zoning code defines what can occur on Public Facilities parcels and billboards are not an allowed use for good reason. These lots are supposed to allow uses that benefit the public: schools, libraries, Metro maintenance yards, etc. If anything, they should be used for housing or transit projects or green space.

In fact, Metro's Vision 2028 Strategic Plan (adopted in 2018) encourages the development of affordable housing near transit (including on Public Facilities lots) to give more people, especially in low-income communities, better access to transit. In June 2021, Metro published an update to the Metro Joint Development Program (JD), a real estate development program for properties owned by Metro, adopted on October 28, 2021,<sup>33</sup> approving a ten-year Joint Development goal of completing 10,000 housing units, at least 5,000 of which would be income-restricted.<sup>34</sup> This Program (the priority of identifying and building housing on Metro's property) was not disclosed or analyzed in Metro's EIR.

Once Public Facilities land has been converted to other uses the ability to use this land for priority housing or for transit will be lost. When it comes to balancing digital billboards verses priority housing, public necessity, convenience, general welfare and good zoning practice would all dictate that this land be preserved for potential housing. TCN signs on this land should therefore be removed from the Program.

<sup>33</sup> <https://metro.legistar.com/LegislationDetail.aspx?ID=5187050&GUID=FEAE735D-6E7E-41CB-A1AB-21F5D40B569A&Options=&Search=>

<sup>34</sup> <https://la.urbanize.city/post/metro-wants-complete-10000-homes-agency-owned-land>

## **Signs Proximate to Los Angeles International Airport (“LAX”)**

Four sign structures would be located in proximity to LAX [1 in the LAX Airport Plan area (FF-31) and 3 in the Westchester-Playa del Rey Community Plan (FF-32, NFF-17, NFF-18)] area. When LAX representatives negotiated to establish a new sign program inside the airport, the airport was granted broad signage opportunities in exchange for reducing sign blight in the area outside the airport. The community supported that plan. How can the City justify putting new signage where the City already promised to remove them... and did so? These sign locations should therefore be removed from the Program.

## **Hours of Operation**

Rather than be honest and upfront with the public regarding the allowable hours of Digital Sign Operation, Ordinance regarding LAMC Section 13.11.1 Section 7.A.3. states:

**3. Hours of Operation.** Hours of operation for all Freeway Facing Signs shall be limited to no earlier than one (1) hour after LACMTA’s first rail service and no later than one (1) hour before LACMTA’s last rail service.

This allows for near 24-hour operation of freeway facing signs. For example, Metro Line A operates from approximately 3:45 AM to 11:45 PM or 11:10 PM daily. Under the Ordinance this would allow for digital sign operations from 4:45 AM to 10:45 PM. The Los Angeles Metro Rail runs from approximately 4:30 AM to 1:30 AM. Under the Ordinance this would allow for digital sign operations from 5:30 AM to 12:30 AM. The Ordinance is silent on which rail service Digital Sign hours of operation would be based on. This lack of clarity is unacceptable.



PhotoSim of NFF-22. Source: [http://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_3100\\_10-30-23.pdf](http://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_3100_10-30-23.pdf)

Even worse, Section B3 allows for operation of Non-Freeway Facing Signs to operate from 5 AM to midnight daily. Even with louvers, this has the potential to impact sleep in residential areas and sensitive uses.

#### 4. INTERNAL INCONSISTENCIES IN THE ORDINANCES

In addition to inconsistencies as to the number of signs, noted previously, the Ordinance regarding LAMC Section 13.11.1 contains what is at best confusing language, and at worst contradictory language, regarding the spacing of signs. Section 2 – Prohibited Locations, reads in part:

d. TCN Support Structures with a Digital Display(s) **shall be at least 1000 feet away** from any other digital Off-Site Sign with a Digital Display on the same side of any portion of a Freeway for Freeway-Facing Signs or on the same side of any portion of a roadway other than a Freeway for Non-Freeway Facing Signs. The foregoing shall not be construed to prohibit Off-Site Signs with double-faced Digital Displays oriented toward opposing directions of the Freeway or roadway other than a Freeway. Compliance will be verified with measurements taken between the TCN Support Structures or other applicable Off-Site Signs with a Digital Display(s).

e. Freeway Facing TCN Support Structures located on the same side of a Freeway **shall not be located within a minimum distance of 1,500 feet from** another Freeway Facing TCN Support Structure.

#### 5. THE CITY HAS NOT ADDRESSED THE ISSUES RAISED IN THE CHANNEL LAW LETTER DATED NOVEMBER 7, 2023

The City has failed to address the very real issues with these ordinances raised in the Channel Law letter. Those concerns remain valid and need to be addressed by the City. For example, the Ordinance regarding LAMC Section 13.11.1 continues to contain provisions that are contrary to State law, such as:

**B. Relationship to the Los Angeles Municipal Code.** Wherever this Ordinance contains provisions which establish regulations that are different from, more restrictive than or more permissive than would be allowed pursuant to the provisions contained in the Code, Supplemental Use District, Specific Plan or other Ordinance, this Ordinance shall prevail and supersede those otherwise applicable regulations.

The Ordinance amending Article 8 of Chapter 1A of the LAMC contains the following provision, which similarly violates State law:

**b. Other Supplemental Districts**

In the event that the provisions of a CPIO conflict with provisions of another Supplemental District, the more restrictive provision shall prevail, except that where the provisions of a CPIO conflict with those of a Historic Preservation Overlay Zone or Transportation Communication Network District, then the provisions of the Historic Preservation Overlay Zone or Transportation Communication Network District shall prevail.

For all of the reasons enumerated above and based upon new information that has come to light since the last PLUM hearing on this matter, we request that PLUM recommend the modifications contained herein and refer the matter back to the CPC for reconsideration and public review to ensure compliance with PLUM recommendations. As part of CPC review, a detailed analysis of Program consistency with the General Plan, including the Community Plans in which digital signs would be located, should be conducted.

We adopt and incorporate by reference all Project comments and objections raised by all others during both Metro's and the City's environmental review and land use entitlement processes for the Project, as well as the administrative record in Citizens For A Better Los Angeles, Coalition For A Scenic Los Angeles dba Coalition For A Beautiful Los Angeles vs Los Angeles County Metropolitan Transportation Authority (*Coalition For A Scenic Los Angeles v. Metro*, Case No. 23STCP00670). Pursuant to PRC Section 21167.6(e) and *Consolidated Irrig. Dist. v. Superior Court*, (2012) 205 Cal.App.4<sup>th</sup> 697, please include all of the hyperlinked references cited in each of the comment letters submitted during the administrative process in the administrative record.

Thank you for your consideration.

Sincerely,

Coalition for a Beautiful Los Angeles

*Barbara Broide*

Co-President

*Wendy-Sue Rosen*

Co-President

**Attachments:**

- A. Catalogue of Program Digital Signs
- B. Coalition for a Beautiful Los Angeles Action Alerts
- C. Editorial by Barbara Broide, December 4, 2023, in City Watch, entitled: "Metro Digital Billboard Program Sparks Outcry: Citizens and Councilmembers Unite Against Potential Hazards and Deceptive Practices"

## **ATTACHMENT B**

### **Coalition for a Beautiful Los Angeles Action Alerts**

## **ATTACHMENT C**

**Editorial by Barbara Broide,  
December 4, 2023, in City Watch  
*Metro Digital Billboard Program Sparks Outcry: Citizens and  
Councilmembers Unite  
Against Potential Hazards and Deceptive Practices***

**ATTACHMENT A**  
**Catalogue of Program Digital Signs**

## Sign Inventory: Digital Billboard Locations by Community Plan Area

The Los Angeles City Planning Department presented a modified version of Metro's TCN on July 12, 2023, with its draft of three proposed City Ordinances to install 86 non-contiguous digital billboards (60 freeway-facing (FF) and 26 non-freeway facing (NFF) changing digital signs) on 49 digital billboard structures (33 freeway-facing and 16 non-freeway facing structures) for a total of 51,000 square feet.

The Department of City Planning Recommendation Report issued on September 1, 2023 recommended removal of FF-3, FF-13, and FF-14. On September 14, 2023, CPC adopted as recommended, changing the Program to 80 non-contiguous digital billboards: 54 freeway-facing and 26 non-freeway facing signs on 46 digital billboard structures (30 freeway-facing and 16 non-freeway facing) for a total of 46,968 square feet.

On November 7, 2023 PLUM approved and December 1, 2023 the City Attorney confirmed: adding back FF-3 (1 structure, 2 faces) and removing FF-4 (1 structure, 2 faces), NFF-7 (1 structure, 1 face), NFF-1 (1 structure, 2 faces), NFF-20 (1 structure, 2 faces) for a total of 75 non-contiguous digital billboards: 54 freeway-facing and 21 non-freeway facing signs on 43 digital billboard structures (30 freeway-facing [with 54 faces + 5 art faces] and 13 non-freeway facing [with 21 faces + 5 art faces]) for a total of 45,500 square feet of total sign area.

### 1. Arleta - Pacoima Community Plan (2 structures, 4 sign faces)

Pacoima Neighborhood Council, CD-7 Monica Rodriguez

**FF-19:** 672 square feet, 48 wide, 80 feet high, 2 sign faces

APN: 2523001900 or APN: 2523001901. SR-118 East of San Fernando Road

Zoning: PF-1XL-CUGU, Public Facilities, Clean Up-Green Up

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**FF-20:** 672 square feet, 48 wide, 80 feet high, 2 sign faces

APN: 2523001900 or APN: 2523001901. SR-118 West of San Fernando Road

Zoning: PF-1XL-CUGU, Public Facilities, Clean Up-Green Up

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

### 2. Boyle Heights Community Plan (4 structures, 8 sign faces)

Boyle Heights Neighborhood Council, CD-14 Kevin de León

**FF-8:** 672 square feet, 48 wide, 85 feet high, 2 sign faces

APN: 5410009905. I-5 South Lanes and Exit Ramp to I-10

Zoning: PF-1XL-CUGU, Public Facilities, Clean Up-Green Up

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Limited Manufacturing, Public Facilities-Freeway

Within 500 feet of residential uses on Pomeroy Avenue (*vertical louvers required*)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**FF-9:** 672 square feet, 48 wide, 50 feet high, 2 sign faces

APN: 5410009901. I-10 West Lanes (Bus Yard)

Zoning: M1-2D-RIO-CUGU, Limited Industrial, River Implementation Overlay District, Clean Up-Green Up ([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4027](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4027))

General Plan Land Use: Limited Manufacturing

Within 500 feet of residential uses on Mitchell Place (*vertical louvers required*)

**ED 1 site: *not eligible* for housing per Mayor's Executive Order**

**FF-10:** 672 square feet, 48 wide, 95 feet high, 2 sign faces

APN: 5171024908. I-10 West Lanes and Entrance Ramp from I-5

Zoning: M3-1-RIO-CUGU, Heavy Industrial, River Implementation Overlay District, Clean Up-Green Up ([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4342](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4342))

General Plan Land Use: Heavy Manufacturing, Public Facilities-Freeway

Within 500 feet of LA River (*vertical louvers required*)

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

**FF-11:** 672 square feet, 48 wide, 95 feet high, 2 sign faces

APN: 5170010901. I-10 East Lanes and Exit Ramp to SR-60 and I-5

Zoning: M3-1-RIO-CUGU, Heavy Industrial, River Implementation Overlay District, Clean Up-Green Up ([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4342](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4342))

General Plan Land Use: Heavy Manufacturing, Public Facilities-Freeway

Within 500 feet of LA River (*vertical louvers required*)

This is a designated historic resource and requires historic preservation review, City of Los Angeles Monument No. LA-902, Olympic Street Bridge, #53C0163, listed January 30, 2008

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

### **3. Central City Community Plan** (3 structures, 5 sign faces)

Downtown Los Angeles Neighborhood Council, CD-14 Kevin de León

**FF-12:** 672 square feet, 48 wide, 80 feet high, 2 sign faces

APN: 5132029905. I-10 West Lanes at Griffin Avenue and East 16th Street

Zoning: M2-2D-O-SN, Light Industrial, 15th Street Sign District

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4236](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4236))

(<https://planning.lacity.org/odocument/b6054fb9-9dc5-4ad5-b7bb-3d75b97fdf36/179827.pdf>)

General Plan Land Use: Light Industrial

**ED 1 site: *not eligible* for housing per Mayor's Executive Order**

**NFF-6:** 300 square feet, 30 feet wide, 30 feet high, 1 sign face

APN: 5149015902. Southwest corner of 4th Street and Hill Street

Zoning: C2-4D, Commercial ([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3322](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3322))

General Plan Land Use: Regional Center Commercial

Within 500 feet of residential uses on 4th Street (*vertical louvers required*)

Across from landmark Angels Flight® Railway, Historic-Cultural Monument #4

**ED 1 site: *is eligible* for housing per Mayor's Executive Order**

**NFF-22:** 300 square feet, 30 wide, 30 feet high, 2 sign faces

APN: 5147035904. Northwest corner of East 7th Street and South Alameda Street

Zoning: M2-2D, Light Industrial

[https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4236](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4236)

General Plan Land Use: Light Manufacturing

Within 500 feet of residential uses on Alameda Street (*vertical louvers required*)

**ED 1 site: *not eligible* for housing per Mayor's Executive Order**

#### **4. Central City North Community Plan** (5 structures, 9 sign faces)

CD-14 Kevin de León

**NFF-8:** 672 square feet, 48 wide, 60 feet high, 2 sign faces

APN: 5173001901. Southeast corner of Alameda Street and Commercial Street

Arts District Little Tokyo Neighborhood Council

Zoning: CM-1-RIO, Commercial Manufacturing, River Implementation Overlay District

[https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3726](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3726)

General Plan Land Use: Commercial Manufacturing

Located on the City's High Injury Network streets

**ED 1 site: *is eligible* for housing per Mayor's Executive Order**

**FF-1:** 1,200 square feet, 60 feet wide, 55 feet high, 1 sign face

APN: 5409023941. US-101 North Lanes at Union Station. 800 N Alameda Street

Historic Cultural North Neighborhood Council

Zoning: ADP-RIO, ADP Alameda District Specific Plan, River Implementation Overlay District

[https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3664](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3664)

General Plan Land Use: Regional Center Commercial

Specific Plan: Alameda District (<https://planning.lacity.org/plans-policies/overlays/alameda-district>)

500 feet within a park (Los Angeles Plaza Park); vertical louvers should be required

This is a designated historic resource and requires historic preservation review, City of Los Angeles Monument No. LA-101, Los Angeles Union Station Passenger Terminal and Grounds, 800-850 North Alameda Street and 357 Aliso Street, listed August 2, 1972. Status Code is 1S: Listed in NR as an individual property. National Register Designation or Eligibility Los Angeles Union Station Passenger Terminal, listed November 13, 1980.

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

**FF-2:** 672 square feet, 48 wide, 72 feet high, 2 sign faces

APN: 5173019901. US-101 South Lanes at Center Street

Arts District Little Tokyo Neighborhood Council

Zoning: PF-1XL-RIO, Public Facilities, River Implementation Overlay District

[https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548)

General Plan Land Use: Public Facilities

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

**FF-3:** 672 square feet, 48 wide, 72 feet high, 2 sign faces

APN: 5409021902. US-101 North Lanes at Keller Street

Historic Cultural North Neighborhood Council

Zoning: PF-1XL-RIO, Public Facilities, River Implementation Overlay District

[https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548)

General Plan Land Use: Public Facilities

**CPC recommended removal, Krekorian/PLUM added back**

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

**NFF-13:** 300 square feet, 30 wide, 30 feet high, 2 sign faces  
APN: 5409025905. Southeast corner of East Cesar Chavez Avenue and North Vignes Street  
Zoning: ADP-RIO, ADP Alameda District Specific Plan, River Implementation Overlay District  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3664](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3664))  
General Plan Land Use: Regional Center Commercial  
Specific Plan: Alameda District (<https://planning.lacity.org/plans-policies/overlays/alameda-district>)  
Located on the City's High Injury Network streets  
**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**5. Encino - Tarzana Community Plan** (1 structure, 2 sign faces)  
Encino Neighborhood Council and Lake Balboa Neighborhood Council, CD-6 Imelda Padilla

**FF-25:** 672 square feet, 48 wide, 80 feet high, 2 sign faces  
APN: 2251002905. I-405 South Lanes at Victory Boulevard  
Zoning: PF-1XL-RIO, Public Facilities, River Implementation Overlay District  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))  
General Plan Land Use: Public Facilities, Public Facilities-Freeway  
Within 500 feet of Sepulveda Wildlife Basin and Woodley Park (*vertical louvers required*)  
**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**6. Granada Hills - Knollwood Community Plan** (1 structure, 2 sign faces)  
Granada Hills North Neighborhood Council, CD-12 John Lee

**FF-24:** 672 square feet, 48 wide, 100 feet high, 2 sign faces  
APN: 2605001912 or 2605001916. I-5 South Lanes at San Fernando Road and Sepulveda Boulevard  
Zoning: PF-1, Public Facilities, Hillside Area  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))  
General Plan Land Use: Public Facilities-Freeway  
**ED 1 site: not eligible for housing per Mayor's Executive Order**

**Hollywood Community Plan: Removed from Program** (2 structures, 4 sign faces)  
East Hollywood Neighborhood Council, CD-13 Hugo Soto-Martinez

**NFF-1:** 300 square feet, 30 feet wide, 30 feet high, 2 sign faces  
APN: 5542015900. Northeast corner of Vermont Avenue and Sunset Boulevard  
Zoning: C2-CSA1, Commercial  
General Plan Land Use: Community Commercial  
Specific Plan: Vermont/Western Station Neighborhood Area  
Located on the City's High Injury Network streets  
Within 500 feet of Barnard Art Park  
**ED 1 site: is eligible for housing per Mayor's Executive Order**  
**Removed at PLUM (requested by CD-13)**

**NFF-20:** 300 square feet, 30 wide, 30 feet high, 2 sign faces  
APN: 5538022909. Southwest corner of Santa Monica Boulevard and Vermont Avenue.  
Zoning: C2-1D, Commercial  
General Plan Land Use: Highway Oriented Commercial  
Specific Plan: Vermont/Western Station Neighborhood Area

Located on the City's High Injury Network streets  
**ED 1 site: *is eligible* for housing per Mayor's Executive Order**  
**Removed at PLUM (requested by CD-13)**

**7. Los Angeles International Airport Plan** (1 structure, 2 sign faces)  
Westchester/Playa Neighborhood Council, CD-11 Traci Park

**FF-31:** 672 square feet, 48 wide, 95 feet high, 2 sign faces  
APN: 4129028901. I-105 West Lanes at Aviation Boulevard  
Zoning: LAX, LAX Los Angeles International Airport  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-20899](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-20899))  
General Plan Land Use: Airport Airside (A Zone)  
Specific Plan: Los Angeles International Airport (LAX)  
(<https://planning.lacity.org/plans-policies/overlays/los-angeles-international-airport-lax>)  
Specific Plan: Coastal Transportation Corridor  
(<https://planning.lacity.org/plans-policies/overlays/coastal-transportation-corridor>)

**ED 1 site: *not eligible* for housing per Mayor's Executive Order**

**8. Northeast Los Angeles Community Plan** (2 structures, 4 sign faces)  
Greater Cyprus Park Neighborhood Council, CD-1 Eunisses Hernandez

**FF-6:** 672 square feet, 48 wide, 88 feet high, 2 sign faces  
APN: 5415002801. I-5 South Lanes at North Avenue 19  
Zoning: M3-1, Heavy Industrial  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4342](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4342))  
General Plan Land Use: Public Facilities  
Within 500 feet of Elysian Park and LA River (*vertical louvers required*)  
This is a designated historic resource and requires historic preservation review, City of Los Angeles Monument No. LA-908, Riverside-Figueroa Bridge, Bridge #53C0160, listed January 30, 2008

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

**FF-7:** 672 square feet, 48 wide, 85 feet high, 2 sign faces  
APN: 5445007903. I-5 North Lanes at San Fernando Road  
Zoning: [Q]PF-1-CDO-RIQ, Public Facilities, River Implementation Overlay District  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))  
General Plan Land Use: Public Facilities  
Community Design Overlay: Cypress Park & Glassell Park  
(<https://planning.lacity.org/plans-policies/overlays/cypress-park-glassell-park>)  
Within 500 feet of Elysian Park and LA River (*vertical louvers required*)

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

Atwater Village Neighborhood Council and Glassell Park Neighborhood Council  
CD-13 Hugo Soto-Martinez

**FF-13:** 672 square feet, 48 wide, 85 feet high, 2 sign faces  
APN: 5436033906. SR-2 South Lanes Northeast of Casitas Avenue  
500 feet from environmentally sensitive properties

**Removed at PLUM (requested by CPC)**

**FF-14:** 672 square feet, 48 wide, 85 feet high, 2 sign faces  
APN: 5442001900. SR-2 North Lanes Northeast of Casitas Avenue  
500 feet from environmentally sensitive properties

**Removed at PLUM (requested by CPC)**

**9. North Hollywood - Valley Village Community Plan** (2 structures, 2 faces)  
CD-2 Paul Krekorian

**FF-15:** 672 square feet, 48 wide, 40 feet high, 1 sign face  
APN: 2324002901. SR-170 South Lanes at Raymer Street  
North Hollywood West Neighborhood Council  
Zoning: PF-1VL, Public Facilities  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))  
General Plan Land Use: Public Facilities  
**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**FF-16:** 672 square feet, 48 wide, 40 feet high, 1 sign face  
APN: 2307021901. SR-170 North Lanes North of Sherman Way  
North Hollywood Northeast Neighborhood Council  
Zoning: PF-1VL, Public Facilities  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))  
General Plan Land Use: Public Facilities  
**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**10. Palms - Mar Vista - Playa del Rey Community Plan** (1 structure, 2 faces) CD-11  
Del Rey Neighborhood Council, CD-11 Traci Park

**FF-30:** 672 square feet, 48 wide, 80 feet high, 2 sign faces  
APN: 4223009906. SR-90 West at Culver Boulevard  
Zoning: PF-1XL, Public Facilities  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))  
General Plan Land Use: Public Facilities, Public Facilities-Freeway  
Specific Plan: Coastal Transportation Corridor  
(<https://planning.lacity.org/plans-policies/overlays/coastal-transportation-corridor>)  
500 feet from nearby environmentally sensitive properties (*vertical louvers required*)  
Within 200 feet of an Ecological Reserve (Inconsistent with SUD Ordinance for this Program)  
**ED 1 site: not eligible for housing per Mayor's Executive Order**

**11. Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan**  
(3 structures, 4 faces), CD-2 Paul Krekorian

**FF-5:** 672 square feet, 48 wide, 65 feet high, 2 sign faces  
APN: 2423037915 or 2423037910 or 2423037914 or 2423038902 or 2423038965.  
US-101 North Lanes, Northwest of Lankershim Boulevard  
Hollywood Hills West or Studio City Neighborhood Council  
Zoning: QIC2-1-CDO-RIO, Commercial, River Implementation Overlay District  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3322](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3322))  
General Plan Land Use: Regional Commercial  
Within 500 feet of South Weddington Park (*vertical louvers required*)  
**ED 1 site: is eligible for housing per Mayor's Executive Order**

**NFF-4:** 300 square feet, 30 feet wide, 30 feet high, 1 sign face

APN: 2423037902 or 2423037908.

Northwest corner of Lankershim Boulevard and Universal Hollywood Drive

Hollywood Hills West Neighborhood Council

Zoning: IQC2-1-CDO-RIQ, Commercial, River Implementation Overlay District

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3322](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3322))

General Plan Land Use: Regional Commercial

Within 500 feet of South Weddington Park and Campo De Cahuenga (*vertical louvers required*)

Metro identified joint development housing sites per Mayor (See [Board Report](#) and [Exhibit C](#))

**ED 1 site: *is eligible* for housing per Mayor's Executive Order**

**NFF-5:** 300 square feet, 30 feet wide, 30 feet high, 1 sign face

APN: 2423037912 or 2423037911 or 2423037919.

Southwest corner of Lankershim Boulevard and Universal Hollywood Drive

Hollywood Hills West Neighborhood Council

Zoning: IQC2-1-CDO-RIQ, Commercial, River Implementation Overlay District

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3322](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3322))

General Plan Land Use: Regional Commercial

Within 500 feet of South Weddington Park and Campo De Cahuenga (*vertical louvers required*)

Metro identified joint development housing sites per Mayor (See [Board Report](#) and [Exhibit C](#))

**ED 1 site: *is eligible* for housing per Mayor's Executive Order**

## **12. Southeast Los Angeles Community Plan** (2 structures, 4 faces)

CD-9 Curren Price Jr.

**FF-23:** 672 square feet, 48 wide, 80 feet high, 2 sign faces

APN: 5122024909. I-110 North Lanes at Exposition Boulevard

South Central Neighborhood Council

Zoning: PF-1, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities, Public Facilities-Freeway

Specific Plan: Conditional Use Approval for Sale of Alcoholic Beverages

(<https://planning.lacity.org/plans-policies/overlays/conditional-use-approval-sale-alcoholic-beverages>)

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

**FF-34:** 672 square feet, 48 wide, 80 feet high, 2 sign faces

APN: 5101040900. I-110 North Lanes at Slauson Avenue

Zapata-King Neighborhood Council

Zoning: PF-1, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities, Public Facilities-Freeway

Specific Plan: Conditional Use Approval for Sale of Alcoholic Beverages

(<https://planning.lacity.org/plans-policies/overlays/conditional-use-approval-sale-alcoholic-beverages>)

Within 500 feet of residential uses on Olive Street (*vertical louvers required*)

**ED 1 site: *review eligibility* for housing per Mayor's Executive Order**

**13. South (and Southeast) Los Angeles Community Plan** (2 structures, 3 faces)  
CD-9 Curren Price Jr.

**FF-21:** 672 square feet, 48 wide, 80 feet high, 2 sign faces

APN: 5037030900 or APN: 5037030902. I-110 South Lanes at Exposition Boulevard  
Empowerment Congress North Area Neighborhood Council

Zoning: PF-1, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities, Public Facilities-Freeway

Specific Plan: Conditional Use Approval for Sale of Alcoholic Beverages

(<https://planning.lacity.org/plans-policies/overlays/conditional-use-approval-sale-alcoholic-beverages>)

Neighborhood Stabilization Overlay: North University Park-Exposition Park-West Adams

(<https://zimas.lacity.org/documents/zoneinfo/ZI2397.pdf>)

Within 500 feet of residential uses on Flower Street (*vertical louvers required*)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**FF-33:** 672 square feet, 48 wide, 80 feet high, 1 sign face

APN: 5001037907. I-110 South Lanes at Slauson Avenue

Voices and Zapata-King Neighborhood Council

Zoning: PF-1, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities, Public Facilities-Freeway

Specific Plan: Conditional Use Approval for Sale of Alcoholic Beverages

(<https://planning.lacity.org/plans-policies/overlays/conditional-use-approval-sale-alcoholic-beverages>)

Within 500 feet of residential uses on 58th Street (*vertical louvers required*)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**Silver Lake - Echo Park - Elysian Valley Community Plan: Removed from Program**

(1 structure, 2 faces) Echo Park Neighborhood Council, CD-1 Eunisses Hernandez

**FF-4:** 672 square feet, 48 wide, 75 feet high, 2 sign faces

APN: 5160024904. US-101 South Lanes at Beaudry Street

Zoning: CW, Central City West Specific Plan

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3652](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3652))

General Plan Land Use: Neighborhood Commercial

Specific Plan: Central City West

(<https://planning.lacity.org/plans-policies/overlays/central-city-west>)

Metro identified joint development housing sites per Mayor (See [Board Report](#) and [Exhibit C](#))

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**Removed at PLUM (requested by CD-1)**

**14. Sun Valley - La Tuna Canyon Community Plan** (2 structures, 4 faces)

Sun Valley Area Neighborhood Council, CD-6 Imelda Padilla

**FF-17:** 672 square feet, 48 wide, 85 feet high, 2 sign faces

APN: 2408038900 or APN: 2408038901. I-5 North Lanes South of Tuxford Street

Zoning: PF-1XL-CUGU, Public Facilities, Clean Up-Green Up

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities, Public Facilities-Freeway  
**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**FF-18:** 672 square feet, 48 wide, 85 feet high, 2 sign faces

APN: 2632001901 or APN: 2632001900. I-5 South Lanes South of Tuxford Street

Zoning: [Q]PF-1XL-CDO-CUGU, Public Facilities, Clean Up-Green Up  
([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Community Design Overlay: Sun Valley

(<https://planning.lacity.org/plans-policies/overlays/sun-valley>)

Streetscape Plan: Sun Valley

(<https://planning.lacity.org/odocument/195da818-04a6-44a1-880f-08a0646b74d8/svystsplan.pdf>)

500 feet within a park (Sun Valley Recreation Center); vertical louvers should be required

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

### **15. Sylmar Community Plan** (1 structure, 2 faces)

Sylmar Neighborhood Council, CD 7 Monica Rodriguez

**FF-22:** 672 square feet, 48 wide, 65 feet high, 2 sign faces

APN: 2603001901 or APN: 2603001900. I-5 North Lanes at San Fernando Road

Zoning: PF-1VL, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities-Freeway

**ED 1 site: not eligible for housing per Mayor's Executive Order**

### **16. Van Nuys - North Sherman Oaks Community Plan** (2 structures, 3 faces)

Van Nuys Neighborhood Council, CD-6 Imelda Padilla

**NFF-9:** 300 square feet, 30 wide, 30 feet high, 2 sign faces

APN: 2240008908. Northeast corner of Van Nuys Boulevard and Orange Line Bus line

Zoning: PF-1XL, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Streetscape Plan: Van Nuys Central Business District

(<https://planning.lacity.org/odocument/c657ea39-4b3a-4bcf-a55c-379a66e042a3/vnycbdstsplan.pdf>)

Located on the City's High Injury Network streets

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**NFF-10:** 300 square feet, 30 wide, 30 feet high, 1 sign face

APN: 2242001902 or 2242001904. Southeast corner of Sepulveda Boulevard and Erwin Street

Zoning: PF-1-RIO, Public Facilities, River Implementation Overlay District

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Limited Manufacturing, Public Facilities

Located on the City's High Injury Network streets

Metro identified joint development housing sites per Mayor (See [Board Report](#) and [Exhibit C](#))

500 feet within a park (Woodley Park and Sepulveda Basin Recreation Area); vertical louvers should be required

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

## 17. West Adams - Baldwin Hills - Leimert Community Plan (2 structures, 3 faces)

Park Mesa Heights Neighborhood Council, CD-8 Marqueece Harris-Dawson

**NFF-11:** 300 square feet, 30 wide, 30 feet high, 1 sign face

APN: 4006024900. Southwest of Crenshaw Boulevard, 175 feet South of 67th Street

Zoning: MR1-2D-SP, Restricted Industrial Zone

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3839](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3839))

General Plan Land Use: Limited Industrial

Specific Plan: Crenshaw Corridor (<https://planning.lacity.org/plans-policies/overlays/crenshaw-corridor>)

Specific Plan: Conditional Use Approval for Sale of Alcoholic Beverages

(<https://planning.lacity.org/plans-policies/overlays/conditional-use-approval-sale-alcoholic-beverages>)

Streetscape Plan: Crenshaw Boulevard

([https://planning.lacity.org/odocument/a75d76ca-a943-4651-a383-bf0e402650db/Crenshaw\\_Boulevard\\_Streetscape\\_Plan\\_.pdf](https://planning.lacity.org/odocument/a75d76ca-a943-4651-a383-bf0e402650db/Crenshaw_Boulevard_Streetscape_Plan_.pdf))

Within 500 feet of residential uses on 67th Street (*vertical louvers required*)

Located on the City's High Injury Network streets

**ED 1 site: not eligible for housing per Mayor's Executive Order**

United Neighbors Neighborhood Council, CD-10 Heather Hutt

**NFF-12:** 300 square feet, 30 wide, 30 feet high, 2 sign faces

APN: 5044002900 or 2044002901 or APN: 2044002903.

Southeast corner of Crenshaw Boulevard and Exposition Boulevard

Zoning: PF-1, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Specific Plan: Crenshaw Corridor (<https://planning.lacity.org/plans-policies/overlays/crenshaw-corridor>)

Specific Plan: Conditional Use Approval for Sale of Alcoholic Beverages

(<https://planning.lacity.org/plans-policies/overlays/conditional-use-approval-sale-alcoholic-beverages>)

Streetscape Plan: Crenshaw Boulevard

([https://planning.lacity.org/odocument/a75d76ca-a943-4651-a383-bf0e402650db/Crenshaw\\_Boulevard\\_Streetscape\\_Plan\\_.pdf](https://planning.lacity.org/odocument/a75d76ca-a943-4651-a383-bf0e402650db/Crenshaw_Boulevard_Streetscape_Plan_.pdf))

Located on the City's High Injury Network streets

Within 500 feet of residential uses on Obama Blvd (*vertical louvers required*)

Within 500 feet of a Scenic Highway (Inconsistent with the City's General Plan Mobility Element)

**Metro won't object to this sign's removal according to Sheppard Mullin Letter**

## 18. Westchester - Playa del Rey Community Plan (3 structures, 6 faces)

Westchester/Playa Neighborhood Council, CD-11 Traci Park

**FF-32:** 672 square feet, 48 wide, 95 feet high, 2 sign faces

APN: 4138001902. I-105 East Lanes at Aviation Boulevard

Zoning: PF-1XL, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Specific Plan: Coastal Transportation Corridor

(<https://planning.lacity.org/plans-policies/overlays/coastal-transportation-corridor>)

Within 500 feet of residential uses on Aviation Blvd (*vertical louvers required*)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**NFF-17:** 672 square feet, 48 wide, 80 feet high, 2 sign faces

APN: 4125026904. Century Boulevard, 152 feet West of Aviation Boulevard

Zoning: M2-1-CPIO, Light Industrial

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4236](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4236))

General Plan Land Use: Light Manufacturing

CPIOD: Westchester/Playa del Rey Implementation Overlay

(<https://zimas.lacity.org/documents/zoneinfo/ZI2500.pdf>)

Specific Plan: Coastal Transportation Corridor

(<https://planning.lacity.org/plans-policies/overlays/coastal-transportation-corridor>)

Located on the City's High Injury Network streets

Metro identified joint development housing sites per Mayor (See [Board Report](#) and [Exhibit C](#))

**ED 1 site: not eligible for housing per Mayor's Executive Order**

**NFF-18:** 672 square feet, 48 wide, 30 feet high, 2 sign faces

APN: 4125020907. Southwest Aviation Boulevard and South of Arbor Vitae Street

Zoning: M2-1, Light Industrial

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-4236](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-4236))

General Plan Land Use: Light Manufacturing

Specific Plan: Coastal Transportation Corridor

(<https://planning.lacity.org/plans-policies/overlays/coastal-transportation-corridor>)

Located on the City's High Injury Network streets

**ED 1 site: not eligible for housing per Mayor's Executive Order**

**19. West Los Angeles Community Plan** (3 structures, 5 faces)

Westside Neighborhood Council, CD-5 Katy Yaroslavsky

**FF-26:** 672 square feet, 48 wide, 95 feet high, 2 sign faces

APN: 4256010902. I-405 North Lanes at Exposition Boulevard

Zoning: PF-1XL, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Specific Plan: Exposition Corridor Transit Neighborhood Plan

(<https://planning.lacity.org/plans-policies/overlays/exposition-corridor-transit-neighborhood-plan>)

Specific Plan: West Los Angeles Transportation Improvement and Mitigation

(<https://planning.lacity.org/plans-policies/overlays/west-los-angeles-transportation-improvement-mitigation>)

Streetscape Plan: Exposition Corridor

([https://planning.lacity.org/odocument/6654e7cb-caf4-49f8-bf4a-54c0837deae/Exposition\\_Corridor\\_Streetscape\\_Plan.pdf](https://planning.lacity.org/odocument/6654e7cb-caf4-49f8-bf4a-54c0837deae/Exposition_Corridor_Streetscape_Plan.pdf))

Within 500 feet of residential uses on Exposition Blvd (*vertical louvers required*)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

West Los Angeles Sawtelle Neighborhood Council, CD-11 Traci Park

**FF-27:** 672 square feet, 48 wide, 95 feet high, 1 sign face

APN: 4260039906. I-405 South Lanes at Exposition Boulevard

Zoning: PF-1XL, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Specific Plan: Exposition Corridor Transit Neighborhood Plan

(<https://planning.lacity.org/plans-policies/overlays/exposition-corridor-transit-neighborhood-plan>)  
Specific Plan: West Los Angeles Transportation Improvement and Mitigation  
(<https://planning.lacity.org/plans-policies/overlays/west-los-angeles-transportation-improvement-mitigation>)

Streetscape Plan: Livable Boulevards

(<https://planning.lacity.org/odocument/0faed1e2-cf13-459a-abb4-f9264644d795/LivableBlvds.pdf>)

Within 500 feet of residential uses on Exposition Blvd (*vertical louvers required*)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**FF-28:** 672 square feet, 48 wide, 80 feet high, 1 sign face

Palms Neighborhood Council, CD-5 Katy Yaroslavsky

APN: 4313024908. I-10 West at Robertson Boulevard

Zoning: PF-1XL, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Specific Plan: Exposition Corridor Transit Neighborhood Plan

(<https://planning.lacity.org/plans-policies/overlays/exposition-corridor-transit-neighborhood-plan>)

Within 500 feet of residential uses on Exposition Blvd (*vertical louvers required*)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

Palms Neighborhood Council, CD-5 Katy Yaroslavsky

**NFF-7:** 300 square feet, 30 wide, 30 feet high, 1 sign face

APN: 4313024909. Venice Boulevard, 240 feet West of Robertson Boulevard

Zoning: PF-1XL, Public Facilities

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-1548](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-1548))

General Plan Land Use: Public Facilities

Specific Plan: Exposition Corridor Transit Neighborhood Plan

(<https://planning.lacity.org/plans-policies/overlays/exposition-corridor-transit-neighborhood-plan>)

Located on the City's High Injury Network streets

Within 200 feet of a Scenic Highway (Inconsistent with the City's General Plan Mobility Element)

**ED 1 site: review eligibility for housing per Mayor's Executive Order**

**Removed at PLUM (requested by CD-5)**

**20. Wilshire Community Plan** (1 structure, 2 faces)

Wilshire Center-Koreatown, CD-13 Hugo Soto-Martinez

**NFF-19:** 300 square feet, 30 wide, 30 feet high, 2 sign faces

APN: 5520019900 or 5520019902. Northwest corner of Vermont Avenue and Beverly Boulevard

Zoning: C2-1, Commercial

([https://codelibrary.amlegal.com/codes/los\\_angeles/latest/lapz/0-0-0-3322](https://codelibrary.amlegal.com/codes/los_angeles/latest/lapz/0-0-0-3322))

General Plan Land Use: Neighborhood Office Commercial

Specific Plan: Adaptive Reuse Incentive Areas

(<https://zimas.lacity.org/processdatalink.aspx?field=SPECPLAN&value=ADAPTIVE%20REUSE%20INCENTIVE%20AREAS&pin=138B197%20%20%20291&address=305%20N%20VERMONT%20AVE>)

Specific Plan: Vermont/Western TOD Station Neighborhood Area Plan

(<https://planning.lacity.org/plans-policies/overlays/vermont-western-tod-station-neighborhood-area-plan-snap>)

Located on the City's High Injury Network streets (*vertical louvers required*)

## ED 1 site: *is eligible* for housing per Mayor's Executive Order

\*\*\*\*\*

### Background

The Certified Final EIR analyzed the installation of up to 34 Freeway Facing (FF) TCN Structures and 22 Non-Freeway Facing (NFF) TCN Structures with a total of 97 digital displays, all on Metro-owned property. The corresponding total maximum amount of sign area associated with digital displays on the TCN Structures was approximately 55,000 square feet.

The original Metro TCN Program proposed 62 digital billboards on 34 freeway-facing structures (6 most double-sided and all but one 672 square feet in size for a total of 42,192 square feet of advertising space) towering over 10 freeways up to 95 feet above grade, and 50 feet above the adjacent roadway. An additional 35 non-freeway facing billboards were proposed to be erected on 22 structures from 30 to 60 feet above grade on 16 different commercial streets, for an additional 12,732 square feet of advertising space. For a total of 56 structures and 97 sign faces.

Metro removed three structures and four sign faces at the request of Councilmember Bonin:

- FF-29: Double-sided Ballona/SR90 (at Culver Blvd)
- NFF-14: One-sided Pico and Exposition (south of Expo rail)
- NFF-15: One-sided Pico (west of Sawtelle)

After certifying the Final EIR, the Metro Board approved the TCN Program but removed TCN Structures FF-29, NFF-14 and NFF-15 from the program (Metro Approved Project). Therefore, the Metro Approved Project consists of 53 TCN Structures and 93 digital displays thereon, rather than 56 TCN Structures and 97 digital displays as included in the Certified Final EIR.

The Metro TCN Program, as approved at the Metro Board's January 26, 2023 meeting (after three sign structures/four faces were removed at the request of Bonin), consists of the installation of up to 33 freeway-facing digital billboard structures and 20 non-freeway facing billboard structures on Metro-owned property (53 structures), many consisting of two-sided billboard structures, resulting in 93 digital billboard advertising faces for a total of 60 freeway-facing signs and 33 non-freeway facing signs.

The City removed four structures and seven sign faces that Metro approved with overriding considerations due to significant impacts on City resources:

- NFF-2: Double-sided Spring Street Bridge
- NFF-3: One-sided NoHo Lankershim and Chandler
- NFF-16: Double-sided Southeast corner of South Central Ave and East 1st Street
- NFF-21: Double-sided South of 4th Street, East of South Santa Fe Ave.

The Los Angeles City Planning Department presented a modified version of Metro's TCN at a July 12, 2023 hearing, with its draft of three proposed City Ordinances to install 86 non-contiguous digital billboards (60 freeway-facing and 26 non-freeway facing changing digital signs) on 49 digital billboard structures (33 freeway-facing and 16 non-freeway-facing structures). Some of these structures will tower 50-95 feet over 10 different freeways, others will be built adjacent to proposed housing projects, and still others will shine into sensitive habitat areas like the Ballona Ecological Reserve.

Of the 49 TCN structures, 33 are proposed adjacent to freeways while the remaining 16 TCN structures are proposed along major intersections and corridors. Overall, the TCN structures will have a total of 86 digital display sign faces; 37 TCN Structures will have two digital display sign faces, and 12 TCN Structures will have one digital display sign face. The TCN Project will cover 22 of the 35 Community Plan Areas in the City and may not exceed the maximum total digital signage area of 51,000 square feet.

### **Resources for Mapping Digital Billboard Locations**

December 2023 TCN Ordinance

[https://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_2\\_12-01-23.pdf](https://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_2_12-01-23.pdf)

November 2023 SUD Zone Ordinance

[https://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_200\\_11-22-23.pdf](https://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_200_11-22-23.pdf)

October 2023 Metro Transportation Communication Network (TCN) - Site Plans/Renderings/Elevations & ZIMAS/Street View Maps

[https://clkrep.lacity.org/onlinedocs/2022/22-0392\\_misc\\_3100\\_10-30-23.pdf](https://clkrep.lacity.org/onlinedocs/2022/22-0392_misc_3100_10-30-23.pdf)

## **ATTACHMENT B**

### **Coalition for a Beautiful Los Angeles Action Alerts**

[View this email in your browser](#)

*Coalition for a Beautiful Los Angeles*  
*Defend our Public Spaces • Protect Our Visual Environment*

## **IMMEDIATE ACTION NEEDED**

### **DIGITAL BILLBOARDS BACK AT PLUM TOMORROW**

**TUESDAY, DECEMBER 5, 2023, 2 p.m.**

ACT NOW TO OPPOSE CITYWIDE DIGITAL BLIGHT

SEND YOUR COMMENTS TO THE CITY NOW

MAKE YOUR VOICE HEARD

*Sample text below (cut and paste)*

*Feel free to adapt in your own words*

Post your written comment to the [City Council File 22-0392](#) comment page.

cc: [losangelesbeautiful@gmail.com](mailto:losangelesbeautiful@gmail.com)

**I join the Coalition for a Beautiful Los Angeles, 27 Neighborhood and Community Councils, 17 environmental and civic organizations, and countless Angelenos in strong opposition to the City's approval of the Metro TCN digital billboard program. I ask that you vote against this measure. If, despite overwhelming opposition this Program moves forward, I ask that you request the removal of the following freeway facing (FF) and non-freeway digital (NFF) signs:**

**Housing:** These billboard sites have been identified either per the Mayor's Executive

Order and/or as a Metro Joint Development Site - suitable for housing:

NFF-4 (CD2/Krekorian) Listed by both the City and Metro

NFF-5 (CD2/Krekorian) Listed by both the City and Metro

NFF-6 (CD14/de Leon) Listed by the City

NFF-8 (CD14/de Leon) Listed by the City

NFF-10 (CD6/Padilla) Listed by Metro

NFF-17 (CD11/Park) Listed by Metro

NFF-19 (CD13/Soto-Martinez) Listed by City

FF-5 (CD2/Krekorian) Listed by City

**Scenic Highway:** This billboard violates the Mobility Element of the General Plan. In fact, Metro's attorneys submitted a letter to the record stating they would not object to this sign's removal.

NFF-12 (CD10/Hutt)

**Ecological Reserve:** This sign adjacent to the Ballona Wetlands Ecological Reserve violates the pending TCN ordinance.

FF-30 (CD 11/Park)

**Designated Historic Resources:**

FF-1 (CD14/de Leon) Union Station

FF-6 (CD1/ Hernandez) Riverside-Figueroa Bridge

FF-1 (CD14/de Leon) Olympic Street Bridge

NFF-6 (CD14/de Leon) Angels Flight Railway (across from) and Grand Central Market

**High Injury Network:** 9 of 13 of these non-freeway facing signs are located on the City's High Injury Network streets.

NFF-8 (CD14 /de Leon )

NFF-9 (CD6/Padilla)

NFF-10 (CD6/Padilla)

NFF-11 (CD 8/Harris-Dawson)

NFF-12 (CD10/Hutt)

NFF-13 (CD14/de Leon)

NFF-17 (CD11/Park)

NFF-18 (CD11/Park)

NFF-19 (CD13/Soto-Martinez)

**Sensitive Uses:** Open Space & Parks: These signs are within 500 feet of a park, open

space, wildlife preserve.

FF-1 (CD14/de Leon) Los Angeles Plaza Park

FF-5 (CD2/Krekorian) South Weddington Park

FF-6 (CD1/Hernandez) Elysian Park and LA River

FF-7 (CD1/Hernandez) Elysian Park and LA River

FF-10(CD14/de Leon) LA River

FF-11 (CD14/de Leon) LA River

FF-18 (CD6/Padilla) Sun Valley Recreation Center

FF-25 (CD6/Padilla) Sepulveda Wildlife Basin and Woodley Park

NFF-4 (CD2/Krekorian) South Weddington Park and Campo de Cahuenga

NFF-5 (CD2/Krekorian) South Weddington Park and Campo de Cahuenga

NFF-10 (CD6/Padilla) Sepulveda Basin Recreation Area and Woodley Park

\*\*\*\*\*

## **The City Needs to Hear From You!**

Post your written comment to the [City Council File 22-0392](#) comment page.

cc: [losangelesbeautiful@gmail.com](mailto:losangelesbeautiful@gmail.com)

No dial-in testimony. Meeting in LA City Hall Council Chamber, Room 350, 200 N. Spring St.

Meeting agenda here: <https://lacity.primegov.com/Portal/Meeting?meetingTemplateId=122224>.

Full Council File access [here](#).

### **Background information FYI:**

Coalition for a Beautiful Los Angeles' [August 22](#), [September 5](#), [September 27](#), and [November 7, 2023](#) comment letters and those further expressed in the September 12, 2023 [Daily News](#) article.

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***Join us in speaking out to protect the environment and our public safety,  
AND help spread the word!  
Numbers Count***

**Following the Metro Board's approval of the Transportation Communication Network digital billboard program in January 2023, the Coalition for a Beautiful Los Angeles filed a lawsuit challenging the environmental approval and Metro's role as lead agency. To help support our cause, please DONATE through our 501(c)(3) non-profit partner. Note "Billboard Blight" in the donation memo line.**

If the City Council moves forward to approve the TCN Program, we will file a lawsuit challenging the City's approval of the Program

**DONATE**

**Contact us at: [losangelesbeautiful@gmail.com](mailto:losangelesbeautiful@gmail.com)**

**We have been the guardians of LA's visual environment since 1986.  
Formerly known as The Coalition to Ban Billboard Blight**

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*Coalition for a Beautiful Los Angeles*  
*Defend our Public Spaces • Protect Our Visual Environment*

**ACTION ALERT**  
**DIGITAL BILLBOARD HEARING**  
**THURSDAY, SEPTEMBER 14, 2023**

The **City Planning Commission** (CPC) will consider the City Planning [Recommendation Report](#) (Report) tomorrow, including the proposed [City Ordinances](#) to implement **Metro's Transportation Communication Network (TCN) digital billboard advertising program** to install 86 giant distracting digital billboards towering 30-100 feet over 10 Los Angeles freeways and a dozen City streets.

\*\*\*\*\*

**The City Needs to Hear From You!**

Submit comments to: [cpc@lacity.org](mailto:cpc@lacity.org)

cc: [randall.winston@lacity.org](mailto:randall.winston@lacity.org) and [losangelesbeautiful@gmail.com](mailto:losangelesbeautiful@gmail.com)

Post your comment to: [City Council File 22-0392](#)

In addition to written comments, it is very important that we have participation at the hearing so please plan to testify via zoom or in-person at City Hall, Room 340, Thursday, September 14, 2023 at 8:30 a.m. The details on how to testify can be viewed on the CPC agenda at:

Join the meeting virtually:

[Join by Zoom](#)

Meeting ID: 848 5633 1778 / Passcode: 033507

**Feel free to adapt the following in your own words:**

**Reference subject:** City Planning Commission Case: CPC-2022-5401-CA, CPC-2023-3653-ZC, ENV-2022-5286-EIR, and [CF 22-0392](#)

Dear President Millman and City Planning Commissioners:

I join the Coalition for a Beautiful Los Angeles in opposing the TCN program for the many reasons enumerated in their [August 22](#) and [September 5](#), 2023 comment letters and those further expressed in the September 12, 2023 [Daily News](#) article describing public safety hazards associated with distracting digital billboards.

In order to accommodate Metro's TCN program, the City of Los Angeles is proposing to adopt three Ordinances, amend the Mobility Element of its General Plan, erect digital billboards in 22 Community Plan areas, override 16 Specific Plans, Supplemental Use Districts or other Overlays, revise the City's 2002 Sign Ordinance and other Municipal Code provisions, ignore CPC recommended sign ordinance amendments (referred to as Version B+), and place its sign ban in jeopardy. I strongly oppose the TCN program and request that CPC reject the Department of City Planning Recommendation Report.

However, if the CPC votes to recommend adoption of the Report despite overwhelming objections from the public, community and environmental organizations, and Neighborhood Councils, I request CPC adopt the following:

- **10:1 Takedown Ratio:** Require, at a minimum, that every square foot of sign area of a new off-site digital sign (freeway-facing and non-freeway facing) be offset by a reduction of more than 10 square feet of existing off-site sign area.
  - Consistent with CPC's recommended B+ version of the Sign Ordinance

- **Hours of Operation:** Digital displays shall only operate between the hours of 7:00 a.m. and 12:00 a.m. (not 5:00 a.m. per Recommendation Report).
  - Consistent with CPC's recommended B+ version of the Sign Ordinance
  - Adjust to 7:00 a.m. – 10:00 p.m. if a digital sign impacts any residential uses
  
- **Scenic Corridors:** No off-site sign shall be located within 500 feet of the center line of a Scenic Corridor, Scenic Highway, Scenic Parkway or Scenic Route as designated on an adopted specific plan, community plan or adopted element of the General Plan.
  - Consistent with CPC's recommended B+ version of the Sign Ordinance
  - Consistent with the Mobility Element of the City's General Plan
  - Scenic Corridor/Parkway Specific Plans must supersede the TCN Ordinance
  
- **Overlays:** Existing Specific Plans, Supplemental Use Districts, Transit Corridor Plans and other planning Overlays must supersede the TCN Ordinance (not the other way around per Recommendation Report)
  
- **Sensitive City Resources:** Removal of all proposed digital signs that would be adjacent to or shine into sensitive areas, including, but not limited to:
  - Ballona Wetlands Ecological Reserve
  - Sepulveda Basin Wildlife Reserve
  - Barnsdall Art Park
  - Mulholland Scenic Parkway
  
- **Refresh Rate:** One refresh rate every 20 seconds (not one refresh every eight seconds per Recommendation Report)
  - 20 second refresh rate as recommended by Illuminating Engineering Society Recommended Practice for Off-Roadway Sign Luminance

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***Join us in speaking out to protect the environment and our public safety,  
AND help spread the word!  
Numbers Count***



**Following the Metro Board's approval of the Transportation Communication Network digital billboard program in January 2023, the Coalition for a Beautiful Los Angeles filed a lawsuit challenging the environmental approval and Metro's role as lead agency. To help support our cause, please DONATE through our 501(c)(3) non-profit partner. Note "Billboard Blight" in the donation memo line.**

**[DONATE](#)**

**Contact us at: [losangelesbeautiful@gmail.com](mailto:losangelesbeautiful@gmail.com)  
We are the guardians of LA's visual environment since 1986  
formerly known as  
The Coalition to Ban Billboard Blight**

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*Coalition for a Beautiful Los Angeles*  
*Defend our Public Spaces • Protect Our Visual Environment*

**ACTION ALERT: City Poised to Approve DIGITAL Billboard Program**

**Testify in Person and Send in Comments**

**Public Hearing: Tuesday, Nov. 7, 2023, 2:00 p.m.**

City Council Committee [Hearing Notice](#) linked here. Sample language is provided below for your convenience. Feel free to cut and paste or personalize.

**Background:** In 2002, the Los Angeles City Council rejected an industry-backed proposal that would have permitted billboard companies to erect 50 new digital sign structures (100 faces) along Los Angeles area freeways in exchange for taking down 2,500 billboards (**25:1 take-down** ratio) – one quarter of all billboards in the city. The City rejected the proposal and adopted legislation that [banned all new off-site billboards](#), with the exception that new billboards would be permitted only within strictly regulated sign districts. The right to regulate billboards was hard won, following a number of lawsuits that challenged the City's 2002 ban. As noted by the Courts, the basis of the ban was to reduce visual blight and improve community aesthetics and traffic safety.

Submit comments to: <https://cityclerk.lacity.org/publiccomment/?cfnumber=22-0392>

Copy to: [clerk.plumcommittee@lacity.org](mailto:clerk.plumcommittee@lacity.org) and [losangelesbeautiful@gmail.com](mailto:losangelesbeautiful@gmail.com)

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**Subject Line:** [CF# 22-0392](#) OPPOSE Metro Digital Billboard, Agenda Item # 10

I/We strongly oppose the Metro Transportation Communication Network (TCN) digital billboard advertising Program (Program). Below is a summary of some of the proposed Program elements that are problematic (also see [August 22](#), [September 5](#) & [September 27](#) letters from Coalition for a Beautiful Los Angeles).

The current proposal represents a huge policy change for the City (as one City Planning Commissioner commented, "Frankly, this is a sea change in signage in our City"). If the City Council Planning and Land Use Management Committee (PLUM) votes to approve this Program over the community's objections, it is incumbent upon the Committee to ensure protections for its citizenry.

Additional Mitigation Needed:

- City proposes 80 sign faces with less than a 3:1 **take-down ratio** (not adequate to offset the impacts of digital vs. static signs).
- City proposes an 8-second **refresh rate** based on [digital billboard] industry standards instead of the 20-second refresh rate recommended by Illuminating Engineering Society Recommended Practice for Off-Roadway Sign Luminance.
- City proposes **operating hours** from 5:00 a.m.-midnight – a 19-hour digital sunrise. Operating hours of 7:00 a.m.-midnight are more than adequate.
- City proposes a 200-foot buffer from **Scenic Highways** in conflict with the [Mobility Element](#) of the General Plan that requires a 500-foot setback from the centerline of a Scenic Highway. The ordinance must comply with the City's General Plan.
- During the City Planning Commission (CPC) hearing, staff commented that the two Bowtie State Park billboards were located too close to the Park. Even at the proposed distances of 619 and 820 feet, staff said it was best not to site the billboards at those locations. Yet, staff did not recommend removing other digital signs proposed in close proximity or adjacent to **sensitive uses** (such as FF-30 Ballona Wetlands Ecological Reserve; NFF-1 Barnsdall Art Park/World UNESCO Site; FF-25 Sepulveda Basin Wildlife Reserve/Woodley Park).
- City proposes all digital billboard faces be equipped with horizontal **louvers** to reduce light trespass. Two billboard structures, adjacent to environmentally sensitive properties, are also slated to have vertical louvers. Post-CPC Planning report is now recommending vertical louvers be installed on all billboard faces within 500 feet of open space and current residential uses. This fails to take into account future housing projects or other sensitive uses. All digital sign faces should include both **horizontal and vertical louvers**.
- The Program proposes four digital billboards located on four parcels that have also been identified by Metro as suitable for joint development agreements for **housing projects** (NFF-17, NFF-10, NFF-4, and NFF-5). Despite the Mayor's Emergency Declarations and Metro's commitment to prioritize housing, no analysis has been conducted to determine the best use of these parcels for housing vs. billboards.
- City proposes to locate 11 of 16 non-freeway facing digital billboards on the City's [High Injury Network](#) streets. This undermines [Vision Zero](#).

- In August 2023, the City of La Mesa **rejected digital billboards** in a [surprise vote](#) because "a majority of the City Council felt the extra revenue wouldn't make up for potentially distracting drivers." This is not surprising because Traffic Safety studies from around the world have demonstrated that changing digital advertising signs are **dangerous and distracting** to drivers. Yet, Metro dismisses these facts relying instead on industry studies.
- The Program does not account for changes in the environment that might occur over time and does not include a provision to allow for new or updated information and studies. It fails to give the **City Council authority** to amend the standards, and other provisions to mitigate impacts on the visual environment, on residential or other properties, to reduce driver distraction or other hazards to traffic, or to otherwise protect and promote the public health, safety and welfare and apply these amended standards to existing signs and digital displays. Language to do so should be incorporated into the approval as recommended in May 25, 2021 [CPC Letter](#) of Determination.
- The Program is [overwhelmingly opposed](#) by 24 Neighborhood and Community Councils, 16 community/environmental organizations, and the [SAG/AFTRA](#) Union for its impacts on filming in LA.

The above list attempts to highlight *some* of the significant unmitigated impacts of the digital billboard Program that if not addressed will blight the City and endanger roadway users for decades to come. See [Exhibit C](#): Site Plans/Renderings/Elevations & ZIMAS/Street View Maps.

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Contact us for more info: [losangelesbeautiful@gmail.com](mailto:losangelesbeautiful@gmail.com)

Please [DONATE](#) through our non-profit 501(C)(3) partner, Canyon Back Alliance, to help fund the legal challenge to Metro's earlier approval of the Program. Note: "**Billboard Blight**" in the donation memo line.

If you'd like to copy individual PLUM members directly:

[Councilmember.Harris-Dawson@lacity.org](mailto:Councilmember.Harris-Dawson@lacity.org),

[Councilmember.Lee@lacity.org](mailto:Councilmember.Lee@lacity.org),

[Councilmember.Hutt@lacity.org](mailto:Councilmember.Hutt@lacity.org),

[Councilmember.Yaroslavsky@lacity.org](mailto:Councilmember.Yaroslavsky@lacity.org),

[Councilmember.Padilla@lacity.org](mailto:Councilmember.Padilla@lacity.org)

Recent articles: [Circling the News](#): L. A. Council Fast Tracking Large Digital Billboards

[Westside Current](#): Westside Councils Push for Digital Billboard Safety Review Ahead of Hearings.



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## **ATTACHMENT C**

**Editorial by Barbara Broide,  
December 4, 2023, in City Watch  
*Metro Digital Billboard Program Sparks Outcry: Citizens and  
Councilmembers Unite  
Against Potential Hazards and Deceptive Practices***

<https://www.citywatchla.com/los-angeles/28073-metro-digital-billboard-program-sparks-outcry-citizens-and-councilmembers-unite-against-potential-hazards-and-deceptive-practices>



## Metro Digital Billboard Program Sparks Outcry: Citizens and Councilmembers Unite Against Potential Hazards and Deceptive Practices

BARBARA BROIDE

DECEMBER 04 2023



LOS ANGELES

METRO TCN - When the City considers reforms to increase transparency in government and diminish undemocratic practices in City Hall, we can all look back on the sad saga and advancement of the Metro Transportation Communication Network (TCN), Metro's Citywide digital billboard program—a pet project of Council President Paul Krekorian for many years. When a Councilmember becomes Council President, a position the public does not vote upon, that person suddenly has great powers to expedite measures, hold back measures from ever being heard, punish his or her fellow Councilmembers for challenging a pet project, and even undermine support and funding of departments that do not lend their full support.

It is a testament to the citizens who have stood firm to protect the 2002 Sign Ordinance that they/we have been able to shield the public right-of-way from the blight and dangers that these digital signs represent—for over 20 years. However, the devious ways in which this program was advanced show just how devoted its promoters have been to deceive the public.

They didn't have the courage to have this program considered in the open and to give the public the opportunity to weigh in BEFORE the City entered into a Memorandum of Agreement with Metro. The fix was in before the program was openly considered. Even the program's title is misleading.

Sadly, one of Mayor Bass' first votes as a member of the Metro Board was to approve the Metro TCN. This even though locations selected for billboards appear on the Metro Joint Development site for housing.

As a Metro Board member, in response to Mayor Bass' challenge to Metro to identify surplus land for housing, Council President Krekorian said that Metro "must play a more active role" in addressing homelessness because it "directly impacts Metro's core mission."

But then why is Krekorian spearheading the use of Metro properties that are slated for housing development so they can instead be used for billboard structures? Four of the TCN structures are slated for properties identified by Metro for housing. Interestingly, two of these Metro lots are in Councilmember Krekorian's district, one is ED 1 eligible. Six more are in Council Districts 6, 11, 13, and 14.

In addition to failing to analyze for housing capacity, the TCN program seeks to place large changing digital billboards on a designated scenic highway (CD 10/Hutt), contrary to the City's Mobility Element of the General Plan, and adjacent to the Ballona Wetlands Ecological Reserve (CD11/Park).

Designated Historic Resource sites will also be negatively impacted by large changing digital billboards—even our cherished City landmarks: Union Station and Angels Flight Railway/Grand Central Market (CD14/de Leon). Two landmark bridges will be impacted: the Riverside-Figueroa Bridge (CD1/Hernandez), and the Olympic Street Bridge (CD14/de Leon).

Who could ever imagine that a city concerned about unnecessary injuries and deaths on our streets, a City whose Vision Zero program is sometimes referred to as Zero Vision, would contemplate placing digital changing advertising billboards on streets already identified as being in the City's High Injury Network. And yet, that is exactly the case for NINE of the 13 non-freeway facing signs slated for LA City streets are located on the City's High Injury Network. Go figure. They are non-freeway facing (NFF) signs 8 (CD14/de Leon), 9 (CD6/Padilla), 10 (CD6/Padilla), 11 (CD8/Harris-Dawson), 12 (CD10/Hutt), 13 (CD14/de Leon), 17 (CD11/Park), 18 (CD11/Park), 19 (CD13/Soto-Martinez).

And finally, in a City whose many neighborhoods are identified as PARK POOR, what could be the rationale for placing changing digital advertising signs within 500 feet of a park, open space, or wildlife preserve? The following list shows just which of these special places will be sharing their open space with Metro's cavalcade of rotating advertisements:

FF-1 (CD14/de Leon) Los Angeles Plaza Park FF-5 (CD2/Krekorian) South Weddington Park  
FF-6 (CD1/Hernandez) Elysian Park and LA River FF-7 (CD1/Hernandez) Elysian Park and LA River  
FF-10(CD14/de Leon) LA River FF-11 (CD14/de Leon) LA River FF-18 (CD6/Padilla)  
Sun Valley Recreation Center FF-25 (CD6/Padilla) Sepulveda Wildlife Basin and Woodley Park  
NFF-4 (CD2/Krekorian) South Weddington Park and Campo de Cahuenga NFF-5

(CD2/Krekorian) South Weddington Park and Campo de Cahuenga NFF-10 (CD6/Padilla)  
Sepulveda Basin Recreation Area and Woodley Park

The issue of driver distraction and the potential for distracting numbers of drivers on our busy freeways and streets simultaneously has also not been adequately addressed. The rotation rate of signs, the impact of the program on the success of the STAP street furniture/transit shelter program and many other important related issues have not adequately been vetted. But the Council President would like this program approved and moved forward before year-end.

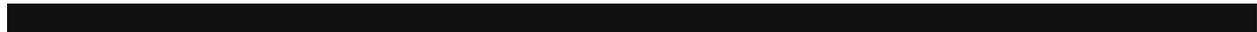
Recommendations made by the City Planning Commission in its Sept. 14th meeting were subsequently and significantly changed by PLUM in its November 7th meeting, and the program should return to the CPC. However, instead, following PLUM's consideration Tuesday (item 22 on a very [full agenda](#)), the program has already been placed on the Council's Wednesday agenda—the very next day. That does not allow for time for changes in PLUM and the careful consideration this program warrants.

The public may submit comments to the [Council File 23-0392](#).

Already 27 Neighborhood and Community Councils have weighed in opposition along with 17 environmental and civic organizations and countless Angelenos.

If widespread opposition isn't enough to stop the program, all these especially problematic signs should be removed. But that won't happen unless enough voices are raised with individual Councilmembers and at PLUM and Council.

*(Barbara Broide is a community activist currently serves as Co-President of the Coalition for a Beautiful Los Angeles (formerly Coalition to Ban Billboard Blight)*



## Communication from Public

**Name:** KimMarie Johnson-Roussell

**Date Submitted:** 12/05/2023 01:54 PM

**Council File No:** 22-0392

**Comments for Public Posting:** PMHCC and it's community voted 4 years ago to NOT HAVE ELECTRONIC BILLBOARDS IN PMHCC. As usual this issue is being proposed again even though our community does not approve of these electronic billboards in our area. It is very underhanded of the proposers to send an email the day before the hearing making it almost impossible for PMHCC community and or its representatives to be present and voice our opposition. This is unfair to our community and takes away our rights to have a say in our community. KimMarie Johnson-Roussell PMHCC Chair

## Communication from Public

**Name:** Dan Silver

**Date Submitted:** 12/05/2023 01:48 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Councilmembers: Please stop the hypocritical and shameful Metro TCN program to plaster the City with crass commercial advertising. The LA Times reports, "Efforts to Reduce Pedestrian Deaths Failing" (Sept 4, 2023). Yet, the program would create dangerous distraction for millions of drivers. Perhaps the proponents assume their child or spouse won't be a victim, but rather someone else's. Many proposed locations will preclude desperately needed affordable housing on publicly owned property. In addition, there are severe impacts on historic resources like Union Station and Grand Central Market, and on irreplaceable wildlife reserves. If you choose to go ahead with this ill-conceived proposal, at least take the following steps and remove these locations which pose particularly bad conflicts:

**Housing:** These billboard sites have been identified either per the Mayor's Executive Order and/or as a Metro Joint Development Site - suitable for housing: NFF-4 (CD2/Krekorian) Listed by both the City and Metro NFF-5 (CD2/Krekorian) Listed by both the City and Metro NFF-6 (CD14/de Leon) Listed by the City NFF-8 (CD14/de Leon) Listed by the City NFF-10 (CD6/Padilla) Listed by Metro NFF-17 (CD11/Park) Listed by Metro NFF-19 (CD13/Soto-Martinez) Listed by City FF-5 (CD2/Krekorian) Listed by City

**Scenic Highway:** This billboard violates the Mobility Element of the General Plan. In fact, Metro's attorneys submitted a letter to the record stating they would not object to this sign's removal. NFF-12 (CD10/Hutt) Ecological Reserve: This sign adjacent to the Ballona Wetlands Ecological Reserve violates the pending TCN ordinance. FF-30 (CD 11/Park) Designated Historic Resources: FF-1 (CD14/de Leon) Union Station FF-6 (CD1/ Hernandez) Riverside-Figueroa Bridge FF-1 (CD14/de Leon) Olympic Street Bridge NFF-6 (CD14/de Leon) Angels Flight Railway (across from) and Grand Central Market

**High Injury Network:** 9 of 13 of these non-freeway facing signs are located on the City's High Injury Network streets. NFF-8 (CD14 /de Leon ) NFF-9 (CD6/Padilla) NFF-10 (CD6/Padilla) NFF-11 (CD 8/Harris-Dawson) NFF-12 (CD10/Hutt) NFF-13 (CD14/de Leon) NFF-17 (CD11/Park) NFF-18 (CD11/Park) NFF-19 (CD13/Soto-Martinez)

**Sensitive Uses: Open Space & Parks:** These signs are within 500 feet of a park, open space, wildlife preserve. FF-1 (CD14/de Leon) Los Angeles Plaza Park

FF-5 (CD2/Krekorian) South Weddington Park FF-6  
(CD1/Hernandez) Elysian Park and LA River FF-7  
(CD1/Hernandez) Elysian Park and LA River FF-10(CD14/de  
Leon) LA River FF-11 (CD14/de Leon) LA River FF-18  
(CD6/Padilla) Sun Valley Recreation Center FF-25 (CD6/Padilla)  
Sepulveda Wildlife Basin and Woodley Park NFF-4  
(CD2/Krekorian) South Weddington Park and Campo de  
Cahuenga NFF-5 (CD2/Krekorian) South Weddington Park and  
Campo de Cahuenga NFF-10 (CD6/Padilla) Sepulveda Basin  
Recreation Area and Woodley Park Thank you for considering  
my views, Dan Silver, MD

## Communication from Public

**Name:** Janet Laur

**Date Submitted:** 12/05/2023 01:48 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Please don't add to the digital mess in Los Angeles. We like to see the sky, any birds that may be left, and any scenery we can see. The last thing we need is more electronic unsightliness. Just because something is PROFITABLE, doesn't make it good. It's proven that nature relaxes us. We are getting very far away from a natural environment. Please don't add to the problem.

## Communication from Public

**Name:** Paula Gerez

**Date Submitted:** 12/05/2023 01:34 PM

**Council File No:** 22-0392

**Comments for Public Posting:** RE: Opposition to CF 22-0392 The Neighborhood Council of Westchester / Playa, a member of the Westside Regional Alliance of Councils, requests that the Metro TCN program be referred to the LA City Council Transportation Committee and LADOT for their consideration before a final decision to implement the program is voted on by the City Council. The Transportation Committee and LADOT need to weigh in on the safety of this program through the study and review of current and historical research that has been done on roadway user distraction with digital billboards and changing message signs. Furthermore, we ask that all the signs being considered in our NCWP footprint be permanently removed from consideration. We ask this as compassionate elected stakeholders for the whole community and authorize the President to take the appropriate action to promote this position. Thank you for your time and thoughtful consideration of our request. Paula Gerez, President



# Neighborhood Council of Westchester Playa

8726 South Sepulveda Boulevard, PMB 191A Los Angeles, CA 90045

213.473.7023 ph • 310.301.3564 fx

email: [inquiries@ncwpdr.org](mailto:inquiries@ncwpdr.org) • [www.ncwpdr.org](http://www.ncwpdr.org)



November 7, 2022

RE: Opposition to CF 22-0392

The Neighborhood Council of Westchester / Playa, a member of the Westside Regional Alliance of Councils, requests that the Metro TCN program be referred to the LA City Council Transportation Committee and LADOT for their consideration before a final decision to implement the program is voted on by the City Council. The Transportation Committee and LADOT need to weigh in on the safety of this program through the study and review of current and historical research that has been done on roadway user distraction with digital billboards and changing message signs. Furthermore, we ask that all the signs being considered in our NCWP footprint be permanently removed from consideration.

We ask this as compassionate elected stakeholders for the whole community and authorize the President to take the appropriate action to promote this position.

Thank you for your time and thoughtful consideration of our request.

Paula Gerez, President

Cc: Traci Park, Councilwoman CD-11

## Communication from Public

**Name:** Ryan Schrader  
**Date Submitted:** 12/05/2023 01:36 PM  
**Council File No:** 22-0392  
**Comments for Public Posting:** Don't jeopardize our rights for safe and considerate transportation for everyone that relies on privacy rights to know which transportation services go to fair destination.

## Communication from Public

**Name:** Mark Zecca

**Date Submitted:** 12/05/2023 01:43 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Please don't proceed with this. This will only ad more blight. Your job is to listen to the citizens not business interests that will scar the city.

## Communication from Public

**Name:** Mark Zecca

**Date Submitted:** 12/05/2023 01:45 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Please don't proceed with this. This will only add more blight to this city. Listen to the citizens not business interests that will scar the city.

## Communication from Public

**Name:** Peter C. Utas

**Date Submitted:** 12/05/2023 01:25 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Eunisses Hernandez, Paul Krekorian, Bob Blumenfield, Nithya Raman, Katy Yaroslavsky, Imelda Padilla, Monica Rodriguez, Marqueece Harris-Dawson, Curren D. Price, Jr., Heather Hutt, Traci Park, John Lee, Hugo Soto-Martinez, Kevin De Leon, Tim McOsker, Consider, please. There is some repetition, in the hope that the message will penetrate. That these billboards are still under consideration suggests to me that the message has yet to be understood - unless the no-conscience possibility is in play. Driver distraction results in injury and death. Billboards distracting drivers cause injury and death. Good urban planning makes a city safer. Good urban planning makes a city safer. Good urban planning makes a city safer. Good urban planning makes cities safer. Driver-directed billboards are bad urban planning. Driver directed billboards are bad urban planning. Driver-directed billboards are bad urban planning. Driver-directed billboards are bad urban planning. Knowing the consequences, worse than bad: evil. Evil policy. Evil policy. Evil policy. Evil policy. Is this difficult to understand? No, it is not. Enable driver distraction and you will injure and kill. This is a known consequence. And you will be ashamed. Or, have you no conscience? There are ways to raise money that will not result in injury and death. Find them and be proud. Please see the attached pdf file: One dead, 2 injured in fiery West Hollywood crash April 3, 2023 By City News Service Photo credit Jon Baird KNX News 97.1 FM Did the billboard distract in this instance, as it was designed to do? If so, it murdered, and there is no mystery. The new boards will be more dangerous: bright, changing, aside the road diverting gaze, multiple drivers simultaneously. Murder, no mystery, and anyone who enabled them will be guilty.

# One dead, 2 injured in fiery West Hollywood crash

April 3, 2023



Did the billboard distract in this instance, as it was designed to do? If so, it murdered, and there is no mystery. The new boards will be more dangerous: bright, changing, aside the road diverting gaze, multiple drivers simultaneously. Murder, no mystery, and anyone who enabled them will be guilty.

## Communication from Public

**Name:** Elaine Livesey-Fassel

**Date Submitted:** 12/05/2023 01:13 PM

**Council File No:** 22-0392

**Comments for Public Posting:** This citizen is very concerned that the question of whether or not to allow more DIGITAL Billboards to proliferate and distract already stressed car and truck drivers is not being heard by more people and taken more seriously by our L.A.City Council. We have far too many lethal accidents and ones that cause our public great injuries as it is and we must be doing all we can to lessen the distractions not add to them! Thank you, with respect!

## Communication from Public

**Name:** Indee Brooke

**Date Submitted:** 12/05/2023 12:33 PM

**Council File No:** 22-0392

**Comments for Public Posting:** LA traffic is already dangerous. With the many major highways that intersect in and near LA, digital billboards would impose a murderous level of distraction on motorists, putting many lives at risk.

## Communication from Public

**Name:** Carolyn Seeman

**Date Submitted:** 12/05/2023 12:29 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I oppose Metro's TCN. We do not need more distractions for drivers and more blight for the city. Please do not approve this project! Carolyn Seeman 11747 Otsego Street Valley Village, CA 91607

## Communication from Public

**Name:** Elaine Livesey-Fassel

**Date Submitted:** 12/05/2023 01:06 PM

**Council File No:** 22-0392

**Comments for Public Posting:** This Los Angeles citizen is very disturbed that the question as to whether or not DIGITAL Billboards are to be allowed to proliferate and distract already stressed car/truck drivers will not have FULL and open discussion by our L.A. City Council and interested citizens is noted. PLEASE allow this to happen! Thank you, with respect!

## Communication from Public

**Name:** Brendan Miller

**Date Submitted:** 12/05/2023 01:06 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I am opposed to digital signage. It is dangerous for drivers and makes our city ugly.

## Communication from Public

**Name:** Alison Bonn

**Date Submitted:** 12/05/2023 12:52 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Digital billboards are distracting to drivers which makes them a danger to our freeways, roads and streets and put people's lives at risk. In addition, they bring visual light pollution and use more energy in a time when we should be making strides to conserve for our future. Furthermore, I don't think they are actually effective for advertisers. Half the time, the digital billboards I pass on the 405 swap screens before I ever have a chance to register what they were advertising. I implore the city not to allow more digital billboards in our city. Sincerely, Alison Bonn

## Communication from Public

**Name:** Gustavo Alcala

**Date Submitted:** 12/04/2023 09:06 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I am Against these Digital Billboards, they are a DISTRACTION along our freeways, highways & surfaces streets, just take a look at the ones we already have, one off the 110 going north after you pass the Coliseum, 405 going north after you pass LAX. They are horrible. How come we have been trying to conserve electricity. We shouldn't allow them. Thanks--

## Communication from Public

**Name:**

**Date Submitted:** 12/04/2023 09:41 PM

**Council File No:** 22-0392

**Comments for Public Posting:** To Whom It May Concern: I join the Coalition for a Beautiful Los Angeles, 27 Neighborhood and Community Councils, 17 environmental and civic organizations, and countless Angelenos in strong opposition to the City's approval of the Metro TCN digital billboard program. I ask that you vote against this measure. If, despite overwhelming opposition this Program moves forward, I ask that you request the removal of the following freeway facing (FF) and non-freeway digital (NFF) signs:

**Housing:** These billboard sites have been identified either per the Mayor's Executive Order and/or as a Metro Joint Development Site - suitable for housing: NFF-4 (CD2/Krekorian) Listed by both the City and Metro NFF-5 (CD2/Krekorian) Listed by both the City and Metro NFF-6 (CD14/de Leon) Listed by the City NFF-8 (CD14/de Leon) Listed by the City NFF-10 (CD6/Padilla) Listed by Metro NFF-17 (CD11/Park) Listed by Metro NFF-19 (CD13/Soto-Martinez) Listed by City FF-5 (CD2/Krekorian) Listed by City Scenic Highway: This billboard violates the Mobility Element of the General Plan. In fact, Metro's attorneys submitted a letter to the record stating they would not object to this sign's removal. NFF-12 (CD10/Hutt) Ecological Reserve: This sign adjacent to the Ballona Wetlands Ecological Reserve violates the pending TCN ordinance. FF-30 (CD 11/Park) Designated Historic Resources: FF-1 (CD14/de Leon) Union Station FF-6 (CD1/ Hernandez) Riverside-Figueroa Bridge FF-1 (CD14/de Leon) Olympic Street Bridge NFF-6 (CD14/de Leon) Angels Flight Railway (across from) and Grand Central Market High Injury Network: 9 of 13 of these non-freeway facing signs are located on the City's High Injury Network streets. NFF-8 (CD14 /de Leon ) NFF-9 (CD6/Padilla) NFF-10 (CD6/Padilla) NFF-11 (CD 8/Harris-Dawson) NFF-12 (CD10/Hutt) NFF-13 (CD14/de Leon) NFF-17 (CD11/Park) NFF-18 (CD11/Park) NFF-19 (CD13/Soto-Martinez) Sensitive Uses: Open Space & Parks: These signs are within 500 feet of a park, open space, wildlife preserve. FF-1 (CD14/de Leon) Los Angeles Plaza Park FF-5 (CD2/Krekorian) South Weddington Park FF-6 (CD1/Hernandez) Elysian Park and LA River FF-7 (CD1/Hernandez) Elysian Park and LA River FF-10(CD14/de Leon) LA River FF-11 (CD14/de Leon) LA River FF-18 (CD6/Padilla) Sun Valley Recreation Center FF-25 (CD6/Padilla)

Sepulveda Wildlife Basin and Woodley Park NFF-4  
(CD2/Krekorian) South Weddington Park and Campo de  
Cahuenga NFF-5 (CD2/Krekorian) South Weddington Park and  
Campo de Cahuenga NFF-10 (CD6/Padilla) Sepulveda Basin  
Recreation Area and Woodley Park  
\*\*\*\*\*

## Communication from Public

**Name:** Patricia Ritter

**Date Submitted:** 12/04/2023 04:02 PM

**Council File No:** 22-0392

**Comments for Public Posting:** My husband and I strongly object to digital billboards that are totally unnecessary, are a distraction to drivers, are on 24/7 and are unsightly!

## Communication from Public

**Name:** Veronica Huerta  
**Date Submitted:** 12/04/2023 04:58 PM  
**Council File No:** 22-0392

**Comments for Public Posting:** I strongly oppose this project on the 2 freeway. There is absolutely no need for this, and I believe it will only make things worse for distracted drivers, for local residents with even more light pollution to add to the already overwhelming sound pollution they already have to endure. There is no other city that has these monstrosities and there is absolutely no benefit to anyone. I do not want to see my neighborhood have more pollution than it already has, and I do not want my neighbors to have to deal with it. I wish Metro would stop telling people it will increase revenue for them so they can hire more drivers. There are other ways to increase staff that do not involve physically imposing large sources of pollution and distraction to our neighborhood. Digital billboards on freeways are dangerous and should not be allowed anywhere outside of pedestrian only zones.

## Communication from Public

**Name:**

**Date Submitted:** 12/04/2023 01:09 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I oppose the TCN. This city does not need digital billboards.

## Communication from Public

**Name:** Casey Vanover

**Date Submitted:** 12/05/2023 09:41 AM

**Council File No:** 22-0392

**Comments for Public Posting:** I and my neighbors strongly oppose electronic billboards in our area. Such displays are a distraction while driving and an eyesore to the area. Please do not expand their usage to the area around the 90 freeway.

## Communication from Public

**Name:** Connie Elliot

**Date Submitted:** 12/05/2023 09:56 AM

**Council File No:** 22-0392

**Comments for Public Posting:** I am opposed to digital billboards, especially on MetroRail property. They distract nearby drivers and are an eyesore. Please do not pass this. I live near the Universal City/Studio City red line station and do not want to be seeing these every time I drive somewhere or take the subway.

## Communication from Public

**Name:** Stewart Oscars  
**Date Submitted:** 12/05/2023 09:52 AM  
**Council File No:** 22-0392  
**Comments for Public Posting:** Please, no digital billboards. The amount of light pollution in Los Angeles is horrible now; do not add to it. Thank you.

## Communication from Public

**Name:** Caitlin D

**Date Submitted:** 12/05/2023 09:34 AM

**Council File No:** 22-0392

**Comments for Public Posting:** These billboards are distracting and dangerous, take away from the natural beauty of this city, and will drive film and TV projects out of the city. Please vote no. Thank you.

## Communication from Public

**Name:** United Neighbors  
**Date Submitted:** 12/05/2023 09:21 AM  
**Council File No:** 22-0392

**Comments for Public Posting:** I am writing to vehemently oppose the proposed Metro Transportation Communication Network (TCN) Ordinance's installation of digital display signs on Metro-owned parcels adjacent to freeways and major streets. These signs, while intended for communication, pose an immense threat to public safety and the aesthetic appeal of our city. Placing dynamic displays in these high-traffic areas is a recipe for driver distraction, significantly increasing the risk of accidents. Additionally, these signs would disrupt the visual harmony of our community, detracting from our city's unique charm and natural beauty. I urge you to reconsider this proposal and explore alternative, less intrusive means of communication that prioritize both safety and the visual integrity of our city. It's crucial to find solutions that meet communication needs without compromising the safety of commuters or the aesthetic appeal of our surroundings. United Neighbors

## Communication from Public

**Name:** clinton j burdette

**Date Submitted:** 12/05/2023 06:53 PM

**Council File No:** 22-0392

**Comments for Public Posting:** It is obvious that no one on this Council is affected by this effort to create more visual blight and waste of resources, hence they do not care about their constituents and their well being!!

## Communication from Public

**Name:** Clara Solis  
**Date Submitted:** 12/05/2023 11:50 AM  
**Council File No:** 22-0392

**Comments for Public Posting:** I am opposed to the TCN. It is dangerous to residents, wildlife, motorists, pedestrians and bicyclists. It is ridiculous to believe that 8 seconds of message will be help to motorists. This will not save lives, it will cause accidents. Having distracting commercial messages for 52 seconds refreshing every 8 seconds will be distracting. The studies sited in the EIR were cherry-picked industry studies that are not reflective of a huge city like Los Angeles with huge traffic problems and a huge population whose native language is not English. Other studies which were ignored in the EIR have shown these types of billboards are dangerous. Additionally, this will increase light pollution in Los Angeles and may prove deadly to migrating birds. Los Angeles is a biodiversity hot spot. Please say no to the TCN. I would rather have a \$5 yearly increase on my property tax bill than have this horrible program that will surely cause lives. It will also open our city up to lawsuits as motorists sue the City when accidents occur.

## Communication from Public

**Name:** Dennis  
**Date Submitted:** 12/05/2023 06:16 PM  
**Council File No:** 22-0392  
**Comments for Public Posting:** Digital Billboards equals distracted driving. There are enough distractions without adding more. Do not make this a profit driven system. STOP VISUAL POLLUTION!

## Communication from Public

**Name:** Martha Clare Ronk  
**Date Submitted:** 12/05/2023 05:17 PM  
**Council File No:** 22-0392  
**Comments for Public Posting:** Please prevent further pollution of our environment with more digital and other billboard signs. I recently traveled in Ireland and it was wonderful to be surrounded by the world and not advertisements. thank you.

## Communication from Public

**Name:** Victoria Brandon

**Date Submitted:** 12/05/2023 12:32 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Please do not allow digital billboards to be placed in our city, they are a tremendous distraction to drivers and pedestrians alike, they are probably a danger to wildlife, and they look God-awful. I can't imagine looking out my window seeing one of these screens, having its light pulsing through my curtains. Los Angeles is changing rapidly, and much of its charm is falling by the wayside. Digital billboards are unnecessary. I wish you would spend your time and efforts looking to enhance the beauty and history of our city instead.

## Communication from Public

**Name:**

**Date Submitted:** 12/05/2023 11:27 AM

**Council File No:** 22-0392

**Comments for Public Posting:** I strongly oppose the City's approval of the Metro TCN digital billboard program. For the safety of motorists and pedestrians of Los Angeles, please vote against this measure. Your constituents depend on you to keep us safe. Thank you! M.H.

## Communication from Public

**Name:** David Garfinkle  
**Date Submitted:** 12/05/2023 02:52 PM  
**Council File No:** 22-0392  
**Comments for Public Posting:** Billboards are a distraction and a blight. Outlaw in urban areas and when visible from major highways

## Communication from Public

**Name:** Kim Yergan

**Date Submitted:** 12/05/2023 02:53 PM

**Council File No:** 22-0392

**Comments for Public Posting:** I am a stakeholder in the Park Mesa Heights Community of CD8. Apt developments on Crenshaw Blvd with no economic benefit (retail)... BLIGHT! 1.3 mile Destination Crenshaw (open air art gallery)... BLIGHT! Cameras at right turn intersections... BLIGHT! Traffic expendentally increased... BLIGHT! Increased traffic and speed along Crenshaw Blvd... BLIGHT! METRO's K-line aka KILLER LINE, at-grade, running through the Community with no ridership... BLIGHT! An unuseable train for the community going nowhere running through the Community... BLIGHT! METRO Digible Billboards in our Community, ... MORE BLIGHT!!! I am opposed to this irresponsible METRO Proposition in our Park Mesa Heights Community.

## Communication from Public

**Name:** Liz Amsden

**Date Submitted:** 12/05/2023 04:44 PM

**Council File No:** 22-0392

**Comments for Public Posting:** My name is Liz Amsden. I've been a resident of Los Angeles for almost 40 years, mostly in Highland Park, and have been involved in community issues for the last 20, and my comments on Item 13 of City Council agenda for Wednesday, December 6th in reference to Council File 22-0392 are as follows: 1) The Transportation Communication Network should not EVER be allowed to erect or permit signs with digital displays within the borders of the City of Los Angeles, whatever entity owns the property, especially the County Metropolitan Transportation Authority who are so clearly in the pockets of the digital signage purveyors; and 2) Article 3 of Chapter 1 of the Los Angeles Municipal Code (LAMC) should NOT be amended to add a section to PERMIT the Transportation Communication Network to ALLOW such signage; and 3) No. NO. NO! to establishment of a Transportation Communication Network District on ANY land within the City of Los Angeles EVER to permit such digital signs. For years, our elected officials and their staffs have been pressured by the lobbyists for powerful industries that want to flood the City with seductive signage for their clients' products. Those paying to put their ads in our faces, will always want more aggressive displays: the larger, the more numerous, and the more distracting the better. Digital signboards are a significant danger in a City already challenged with maintaining traffic safety. Image change motion creates multiple driving hazards, including attracting eyeballs away from the road which is unacceptable in a congested urban environment. Agreeing to alter existing legislation enacted to protect the PEOPLE of Los Angeles whom you were elected to serve is NOT in your constituents' best interests. At ALL. All types of billboards contribute to urban blight, however digital ones aggravate light pollution, disrupt our peaceful neighborhoods, hurt property values, harm the environment, and negatively impact the physical and mental health of people and animals living within range of their electronic humming and flickering lights. Especially with the extended hours. Little kids can't go to sleep at seven if there is humming and flickering outside their windows. Next, how the heck is Los Angeles EVER going to REDUCE its carbon footprint, if the City authorizes these power-sucking monstrosities? Everything MUST go on hold until and unless a

solution satisfactory to ALL parties, including every resident, is reached. Repeating that digital billboards have no impact on safety over and over does not make it true. What none of these digital signs deals address is HOW such will be regulated, leaving lots of lovely loopholes for their purveyors to disregard consumer protection and allow waivers for everything else including location, hours of operation, and light pollution. Take-down requirements are absolutely needed but do you need to replace the bad with worse? A study comparing stretches of highways with digital billboards in Florida and Alabama without indicated teens were more easily distracted... there were 25% to 30% fewer accidents, especially multi-vehicle collisions, in areas with only static signage. And that was on highways with far less driving challenges than we face every day on our city streets. People will be even more distracted by flashing lights and enticing messages and, without appropriately reducing speed, this will lead to increased accidents and injuries. Prior to the pandemic, 200 firms employing 442 lobbyists were registered with the Ethics Commission and were paid \$58 million the prior year to promote the interests of 1,400-odd clients and other companies pushing for the relaxation of the current ordinance. Making it easier for people to make money from these billboards does not help quality of life for Angelenos. Nor do I believe there will be ANY positive impact on the City's budget. As Co-Chair of the Neighborhood Council Budget Advocates for six or seven years, I've seen how the City manipulates its own budget and have absolutely no faith that Metro's underlying calculations even approach reality. In fact, having worked in the film business much of my life, I am highly cognizant about just how "net" revenues are calculated. The gross income that Metro and the TCN proponents are pushing as bait may be truly tantalizing but after their shyster accountants extract their expenses, how much do you think will actually remain for Angelenos? Having taken over the County, Allvision and its brethren are now in Mortal Kombat to impose a Bladerunner-esque nightmare on the City of Los Angeles. Please send the whole TCN concept back to the sticks to die. People should matter more than profit - for manufacturers, billboard purveyors... or fo, for that matter, Councilmembers.

## Communication from Public

**Name:** Rosalie Strickland  
**Date Submitted:** 12/05/2023 06:06 PM  
**Council File No:** 22-0392  
**Comments for Public Posting:** I'm against visual billboard pollution and request the Council to act with integrity regarding this issue. Thank you for your careful stewardship of our city. Rosalie Strickland

## Communication from Public

**Name:** Lauren Chang  
**Date Submitted:** 12/05/2023 12:16 PM  
**Council File No:** 22-0392  
**Comments for Public Posting:** We represent the Los Angeles County Metropolitan Transportation Authority (“LACMTA”) with respect to the proposed Transportation Communication Network Program. LACMTA submits the letter attached for the PLUM Committee's consideration. This is for Council File No. 22-0392. Please also add this information to the administrative record for the matter.

December 5, 2023

213.617.4216 direct  
jrubens@sheppardmullin.com

File Number: 89EH-376404

**BY EMAIL**

Planning and Land Use Management  
Committee  
Los Angeles City Council  
City of Los Angeles  
200 N. Spring Street, Room 340  
Los Angeles, California 90012  
email: clerk.plumcommittee@lacity.org

Re: Proposed TCN Ordinances – Removal of Two Additional Signs  
(December 5 PLUM Hearing-Council File No. 22-0392)

Honorable Councilmembers:

This firm represents the Los Angeles County Metropolitan Transportation Authority ("LACMTA") with respect to the proposed Transportation Communication Network Program (the "TCN Program"). LACMTA continues to be very appreciative the City's significant efforts to implement it.

On November 7, 2023, the Planning and Land Use Management Committee (the "PLUM Committee") referred the three proposed ordinances (the "TCN Ordinances") that would implement the TCN Program to the City Attorney for form and legality review, subject to certain recommended amendments to the principal ordinance (the "TCN District Ordinance") that would establish the Transportation Communication Network District. The recommended amendments include the removal of six additional TCN signs. LACMTA is agreeable to the elimination of those signs.

In addition, LACMTA will agree to the removal of two more signs, as follows:

1. Non Freeway-Facing Sign NFF-12 (Southeast Corner of Crenshaw Boulevard/Exposition Boulevard). A concern has been raised that NFF-12 could impact the residents of a future residential project in proximity to the planned location of NFF-12. For this reason, Metro is agreeable to the removal of NFF-12 in the final TCN District Ordinance.
2. Freeway-Facing Sign FF-30 (SR-90 West at Culver Boulevard). Metro has been asked to remove FF-30 due to its proximity to the Ballona Wetlands. While FF-30 would not be located in the Coastal Zone, as a further accommodation, Metro will not contest its removal in the final TCN District Ordinance.

Planning and Land Use Management Committee  
December 5, 2023  
Page 2

LACMTA respectfully requests the PLUM Committee's favorable recommendation to the City Council with regard to the TCN Ordinances.

Very truly yours,



Jack H. Rubens  
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

SMRH:4881-4584-4885.1

cc: Ms. Holly Rockwell (BY EMAIL)  
Mr. John Beck (BY EMAIL)  
Ronald W. Stamm, Esq. (BY EMAIL)

## Communication from Public

**Name:** Cary Odes

**Date Submitted:** 12/05/2023 12:21 PM

**Council File No:** 22-0392

**Comments for Public Posting:** Signs that are distracting and dangerous should not be allowed, let alone promoted by the city. In the past Los Angeles allowed bright and large LED signs to mar the city and distract drivers. Doing it again to make money is a dangerous direction for the city to take. How many accidents will this cause? How many residents will be kept up at night by flashing signs glaring in their windows? They pay the price and the city takes the money. Terrible idea by short sighted politicians.

## Communication from Public

**Name:** Andrew U

**Date Submitted:** 12/05/2023 09:33 PM

**Council File No:** 22-0392

**Comments for Public Posting:** The fact that billboards of any kind -- and especially giant electronic ones are being considered by this body speaks to the fact that the LA City Council is not even remotely fit for purpose and does not have the interests of the rank-and-file residents of this city at heart. What is shown on billboards? Advertisements and propaganda. Sure, there may be the odd 'public service announcement' that doesn't qualify as pharmaceutical industry advertising or some other corrupt corporate scheme. But putting in billboards under the guise that they're a public service is like a college fraternity claiming that it exists for charitable purposes. Bollocks! Take away the keggers and they'd disappear as quickly as billboards without corporate sponsors and taxpayer-funded lies. These billboards don't 'serve' anyone but the advertisers, propagandists, and the weasel politicians on the take. Who on the City Council thinks that people generally benefit from advertising and propaganda more than they'd benefit from views of the sky, mountains, plants, buildings or practically anything else? Where is the voice for clean public spaces, uncluttered by psychologically manipulative messages? You don't need to see statistics on danger to drivers, danger to animals, or nuisance. Sure these signs pose immediate danger to life and limb. Sure they confuse the heck out of wildlife. Sure they mess with human sleep patterns. But the biggest danger is the danger to our minds. One would think a bunch of supposedly-intelligent people to be capable of sussing that out. People in cities full of advertising are in a state of mental crisis never before seen. Decades of consuming similar nonsense on phones and televisions have rotted brains from coast to coast. Signs like those proposed just make similar messages an unavoidable part of occupying public space. You know something is seriously wrong when taxpayers are seeing taxpayer-funded ads for taxpayer-funded psychiatrists (where they surely dole out taxpayer-funded meds) on the very same billboards that helped addle their minds in the first place. It would be funny if it weren't so sad. A body interested in the wellbeing of residents would strike this proposal down in a heartbeat. A body serving the residents would do the same with all other advertising on public property. Take it down. Buy it back. Outlaw it. Do it so that folks riding public trains and busses can use their eyes without being force-fed subliminal messages.

Shouldn't that be the bare minimum? But not this body. This body makes excuses and talks about revenue. It talks about trading some billboards for others as if any of them are acceptable. This body is either brazenly corrupt, woefully incompetent, actually malicious, or all three. There is no other way to read the serious consideration of this measure.